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935-965 Market Street Project
CityPlace
Comments and Responses
May12, 2010

Planning Department Case Number: 2005.1074E

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A. INTRODUCTION

PURPOSE OF THIS COMMENTS AND RESPONSES DOCUMENT

The purpose of the Comments and Responses (C&R) document is to present comments submitted on the Draft Environmental Impact Report (DEIR) for the proposed 935-965 Market Street Project and to respond in writing to substantive comments. Pursuant to the California Environmental Quality Act (CEQA) Public Resources Code Section 21091 (d)(2)(A) and (B), the City has considered the comments received, evaluated the issues raised, and herein provides written responses that describe the disposition of each environmental issue that has been raised by the commentors. Comments were made in written form during the public comment period from November 5 to December 21, 2009, and as oral testimony received before the Planning Commission at the public hearing on the Draft EIR held on December 10, 2009. All substantive oral and written comments are included herein in their entirety as well as a complete transcript of proceedings from the public hearing on the Draft EIR. A complete list of commentors is provided in Section B.

The DEIR, together with this C&R document, will be presented to the Planning Commission in an advertised public hearing, and will be certified as a Final Environmental Impact Report (FEIR) if deemed adequate with respect to accuracy, objectiveness, and completeness. The FEIR will consist of the DEIR, the comments received during the public review period, responses to the comments, and any revisions to the DEIR that result from public agency and public comments and from staff-initiated text changes.

ENVIRONMENTAL REVIEW PROCESS

The project sponsor originally submitted an Environmental Evaluation application for the proposed 935-965 Market Street Project on November 14, 2005, and then submitted a revised application on January 29, 2007 to reflect modifications to the project proposal. The Planning Department published and circulated a Notice of Preparation of an Environmental Impact Report / Initial Study (NOP/IS) for the modified proposal on October 1, 2008 that solicited comments regarding the scope of the EIR for the proposed project. The City accepted written comments on the Draft EIR content through October 31, 2008.

The Planning Department subsequently prepared the DEIR for the proposed 935-965 Market Street Project in accordance with the California Environmental Quality Act (CEQA) of 1970, as amended, the *CEQA Guidelines*, and Chapter 31 of the *San Francisco Administrative Code*. The DEIR was published on November 4, 2009. A public review and comment period was then held from November 5 to December 21, 2009, which meets the requirements of CEQA for a 45-day review

period, to solicit public comment on the adequacy and accuracy of information presented in the DEIR. The comments received during the public review period are the subject of this C&R document, which addresses all substantive written and oral comments on the DEIR.

The City has revised the EIR as appropriate and will present it to the Planning Commission for certification as to accuracy, objectiveness, and completeness. The City will consider the certified FEIR, along with other information and the public process, to determine whether to approve, modify, or disapprove the proposed project, and to specify any applicable environmental conditions as part of project approvals.

If the City decides to approve the proposed project with significant effects that are identified in the Final Environmental Impact Report, but which are not avoided or reduced to a less-than-significant level, the City must indicate that any such unavoidable significant effects are acceptable due to overriding considerations as described in *CEQA Guidelines* Section 15093. This is known as a Statement of Overriding Considerations. In preparing this Statement, the City must balance the prescribed types of benefits of the proposed project against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (*CEQA Guidelines* Section 15093). If an agency makes a Statement of Overriding Considerations, the statement must be included in the record of project approval.

DOCUMENT ORGANIZATION

Section B presents the List of Commentors organized by written and/or oral comments from City commissioners, organizations, and interested individuals. Section C, Comments and Responses, presents verbatim excerpts of the substantive comments, organized by topic. Each comment from a comment letter is identified with an alphabetic letter denoting the comment letter from which it is excerpted, and a comment number denoting its sequence within the letter. Each oral comment from the transcript is denoted by "TR" (for transcript) and is identified with an alphabetic letter denoting the commentor and a comment number denoting its sequence within that person's comments at the public hearing. Appendix A to this C&R document presents copies of the written comment letters from which the excerpts are derived, and Appendix B presents the transcript of the oral testimony received at the public hearing on the EIR from which the transcript comments are derived.

Comments on the EIR in the letters and transcript are bracketed, and each bracketed comment has two codes. The first, in boldface type, corresponds to the Section C topic in which the comment is shown and the corresponding response given. For example, "2.1" directs the commentor to see **Section 2.1 - Transportation Impact Analysis Methodology: Study Area,** in Section C for the response to that comment. The second, in parentheses, represents the identifier for that particular comment. (See Section B, List of Commentors, for the letter designations by commentor.) These

codes also appear at the end of the comment summaries in Section C to help tie the excerpted comments to their parent letter or to the transcript.

Following each comment or group of comments on a topic is the City's response. Similar comments are grouped together by topic area and may be addressed by a single response. The responses generally provide clarification of the EIR text. The responses may also include revisions or additions to the EIR. Revisions or additions to EIR text show as indented text. New or revised text is underlined; deleted material is shown as ~~strikethrough~~ text. The subject matter of one topic may overlap with that of other topics, so the reader must occasionally refer to more than one group of comments and responses to review all the information on a given subject. Cross-references are provided in those instances.

Section D presents text changes to the EIR reflecting both text changes made as a result of a response to comments as well as staff-initiated text changes identified by San Francisco Planning Department staff to update, correct, or clarify the EIR text. The changes have not resulted in significant new information with respect to the proposed project, including any new significant environmental impacts or new mitigation measures. Therefore, recirculation of the Draft EIR pursuant to *CEQA Guidelines* Section 15088.5 is not required.

This C&R document will be incorporated into the Final Environmental Impact Report as a new chapter. The changes to the EIR's text and figures called out in Section C. Comments and Responses and in Section D. Draft EIR Text Changes will be incorporated into the Final Environmental Impact Report.

B. LIST OF COMMENTORS

The San Francisco Planning Commission, organizations, and individuals submitted comments on the EIR which the City received during the public comment period from November 5, 2009 to December 21, 2009. Some of the comments were provided during a public hearing on the EIR before the Planning Commission, held on December 10, 2009. A designation beginning with "TR" indicates oral comments provide at the public hearing. A complete list of commentors, with the corresponding e-mail, letter, and/or transcript designation for each commentor, is provided below.

DESIGNATION	COMMENTOR	DATE RECEIVED
San Francisco Planning Commissioners		
Letter E	Commissioner Hisashi Sugaya	December 10, 2009
TR/O	President Ron Miguel	December 10, 2009
TR/P	Commissioner Hisashi Sugaya	December 10, 2009
TR/Q	Commissioner Michael J. Antonini	December 10, 2009
TR/R	Commissioner William L. Lee	December 10, 2009
TR/S	Commissioner Kathrin Moore	December 10, 2009
Organizations		
Letter C	Howard Strassner, Sierra Club-San Francisco Group	December 16, 2009
Letter F	John Elberling, The Yerba Buena Consortium	December 16, 2009
Letter H	Tom Radulovich, Livable City	December 21, 2009
Letter I	Andy Thornley, San Francisco Bicycle Coalition	December 21, 2009
TR/L	Randy Shaw, Director, Tenderloin Housing Clinic	December 10, 2009
TR/M	Carolyn Diamond, Executive Director, Market Street Association	December 10, 2009
TR/N	Manny Flores, Carpenters Local 22	December 10, 2009
Individuals		
Letter A	Arthur Levy, Attorney	December 21, 2009
Letter B	Jane Weil	November 20, 2009
Letter D	Joni Marie Theodorsen, Pearl Art & Craft	November 18, 2009
Letter G	Laura Kennedy	December 7, 2009
Letter J	John Fordham	December 21, 2009
TR/K	Brian Sheehy	December 10, 2009

C. COMMENTS AND RESPONSES

Comments on the DEIR and DEIR Appendix A: Notice of Preparation/Initial Study, are excerpted and grouped by topic under their respective headings. Each comment, or group of comments, is followed by a response to the comment or group of comments.

INTRODUCTION

A number of the responses provided in this document as well as the *City Place Transportation Study - Supplemental Traffic and Pedestrian Analysis* (hereafter "*Supplemental Transportation Analysis*"), conducted to respond to specific comments, refer to an alternative variant that has been added to the EIR. For ease of comprehending the responses, a description of this alternative variant and the reasons for its inclusion are presented here for reference. The Draft EIR text changes to include this variant are presented in Section D of this document under Chapter VI, Alternatives.

THE REDUCED PARKING VARIANT OF THE NO GARAGE ALTERNATIVE

The Reduced Parking Variant of the No Garage Alternative (Reduced Parking Variant) would involve the construction of an approximately 335,950-gsf building, with the same square footage devoted to retail uses, loading, common areas, and mechanical and storage space as for the proposed project or the No Garage Alternative. In comparison to the No Garage Alternative, the Reduced Parking Variant would provide one level of parking located in a second basement level and would result in a net increase of 149,550 gsf of developed space on the project site. This variant would not have the same amount of building area devoted to parking and circulation as the proposed project, because it would not include the third basement level.

The Reduced Parking Variant would not include the third basement level. In comparison to the No Garage Alternative and the proposed project, the variant would provide 80 off-street parking spaces instead of none or 188 off-street parking spaces. In addition, two parking spaces would be required to be reserved for exclusive use as car-sharing parking spaces. A minimum of 23 bicycle parking spaces would be provided on the B2 level, and off-street parking provided under this variant would not be free of charge.

Under this variant, the removal of the third basement level would reduce the overall building gross square feet, which would result in a change in the amount of transferable development rights (TDR) needed or may result in no need for TDR, depending on whether a variance from the requirements of *Planning Code* Section 102.11 is granted and on the applicability of the exceptions to the FAR

calculation identified in *Planning Code* Section 102.9(b). The Reduced Parking Variant was added to the analysis in order to understand the potential environmental impacts that would result from a range in the amount of parking between the provision of no onsite parking as provided by the No Garage Alternative and the provision of two levels of parking as provided by the proposed project. Please see Section D. Draft EIR Text Changes, Chapter VI, Alternatives, for a description of this variant and its potential environmental impacts.

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

1.0 PLANS AND POLICIES

1.1 Conflict with General Plan Priority Policies

Comment

"4. Land Use Plans and Policies, Settings, and Impacts. This discussion does not recognize, discuss, or analyze the inconsistency of the project with the following, Priority Policies: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) discouragement of commuter automobiles; and, (4) landmark and historic building preservation." *(Arthur Levy, Attorney, December 21, 2009) [A-18]*

Response

The commentor states that the environmental impact analysis did not address the inconsistency of the proposed project with four of the eight San Francisco Priority Policies. The specific policies referenced are usually identified as Priority Policies 1, 2, 4, and 7. The aspects of the proposed project that relate to these four of eight Priority Policies, as they are relevant to effects on the physical environment, are covered in the EIR. A discussion of the area's neighborhood-serving retail uses and neighborhood character can be found on EIR pp. IV.A.1-A.3 and pp. IV.B.1-IV.B.5, and in the Notice of Preparation/Initial Study (NOP/IS), pp. 26-33, which is attached as Appendix A to the EIR. The project site's access to transit is discussed on EIR pp. IV.C.7-IV.C.14 and the City's Transit First Policy is discussed on EIR pp. IV.C.21-IV.C.22. Potential impacts to historical architectural resources are discussed in the NOP/IS, pp. 36-41.

The identification of the Priority Policies and the section of the NOP/IS where the evaluation of the Priority Policies is found is provided on NOP/IS pp. 23-24. The NOP/IS, p. 27, states that the Priority Policies provide general policies and objectives to guide certain land use decisions and that some of these policies relate to physical environmental issues. It also states that "the proposed project would not obviously or substantially conflict with any such policy." In addition, as stated on EIR III.1, "the case report and approval motions for the proposed project will contain the Planning Department's comprehensive project analysis and findings regarding consistency of

the proposed project with the Priority Policies. The proposed project was reviewed against the Priority Policies and no inconsistencies were identified."

As discussed in the NOP/IS, the proposed new building would be constructed within the existing boundaries of the combined lots, would not interfere with or change the existing street plan, and would not impede the passage of persons or vehicles. Furthermore, the surrounding uses and activities would interrelate with each other as they currently do. Thus, in terms of consistency with the Priority Policies identified in the comment, the proposed retail development would not divide the established community in the Mid-Market area, would not result in the loss of historic resources as defined under CEQA – thus creating an inconsistency with the City's historic preservation efforts – and, due to its location along the Market Street transit corridor, would provide a variety of local and regional transit options to its future patrons and employees, potentially discouraging commuter automobile use. The proposed project would not be inconsistent with the cited Priority Policies and, as stated above, the relevant environmental effects of the proposed project that relate to the cited Priority Policies are covered in the Draft EIR under the appropriate environmental topics.

Furthermore, the City and County of San Francisco's entitlement processes assure that prior to issuing a permit for any project that requires an Initial Study under CEQA, and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City will evaluate the proposed project's consistency with the Priority Policies. In evaluating *General Plan* consistency of the proposed project and reviewing the building permit application for the proposed project, the Planning Commission and/or Planning Department would make the necessary findings of consistency with the Priority Policies. This consideration of *General Plan* objectives and policies is carried out independent of the environmental review process, as part of the decision to approve, modify, or disapprove a proposed project.

2.0 TRANSPORTATION AND CIRCULATION

2.1 Transportation Impacts Analysis Methodology: Study Area

Comments

"Transportation and circulation, I think the area that was studied for the transportation study is too small and should be expanded to include at least out to Folsom Street and Third to Eighth." *(Planning Commissioner Hisashi Sugaya, public hearing comments, December 10, 2009) [TR/P-3]*

"The Transportation Study Area and Intersection Analysis Locations (Fig. IV.C.1) outlines the Study Area. This restricted area is wholly inadequate to evaluate traffic impacts associated with the proposed project. Third Street must be included as well as Folsom Street. These are major

access streets into downtown and to the proposed development." (*Planning Commissioner Hisashi Sugaya, December 10, 2009) [E-4]*

Response

The *Supplemental Transportation Analysis* completed in May 2010 to address the comment that the limits of the original transportation study area were inadequate.[1] The boundaries of the original transportation study area were determined using the *SF Guidelines*.[2] This response summarizes the results of the supplemental traffic analysis conducted for Existing, Existing Plus Project, and 2030 Cumulative Conditions for the proposed project as well as the No Garage Alternative and its Reduced Parking Variant.

The results of the *Supplemental Transportation Analysis* are summarized below and have been added to the EIR text in Chapter IV, Section C. Transportation and Circulation, for the proposed project, and in Chapter VI, Alternatives, for the No Garage Alternative and its Reduced Parking Variant. The text additions are presented at the end of this response and in Section D, Draft EIR Text Changes.

Supplemental Transportation Analysis Results

The following five signalized intersections[3] were included in the *Supplemental Transportation Analysis* as locations that could potentially be affected by vehicles generated by the proposed project and the alternatives analyzed:

- Third Street/Mission Street;
- Third Street/Folsom Street;
- Seventh Street/Mission Street;
- Seventh Street/Folsom Street; and
- Eighth Street/Folsom Street.

---

[1] This response summarizes the results presented in the Technical Memorandum *CityPlace Transportation Study – Results of Supplemental Traffic and Pedestrian Analysis*, May 5, 2010, prepared by AECOM (hereafter "*Supplemental Transportation Analysis*"). This technical memorandum is available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

[2] San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review* (*SF Guidelines*), October 2002.

[3] The Stockton/O'Farrell intersection was included as part of the No Garage Alternative Analysis in the EIR because this intersection would receive project-generated traffic as part of the assignment of traffic to parking garages north of the project site (see EIR p. VI.10 for a discussion of the reassignment of traffic under the No Garage Alternative and the addition of the Stockton/O'Farrell intersection). This intersection is shown on Figure C&R.1.

These study intersections as well as the original intersections are shown in Figure C&R.1: Original Study Intersections and Supplemental Study Intersections. The supplemental study intersections were analyzed for the proposed project, the No Garage Alternative, and its Reduced Parking Variant for Existing and 2030 Cumulative Conditions. The results show that implementation of the proposed project, the No Garage Alternative, or its Reduced Parking Variant would not result in any significant adverse traffic impacts at any of the supplemental study intersections within the expanded transportation study area. The supplemental traffic analysis verified that no significant project-related impacts would result in the broader area analyzed. Therefore, the transportation study area identified for analysis presented in the Draft EIR was adequate.

Existing and 2030 Cumulative Conditions Plus Proposed Project

As shown in Table C&R.1, traffic generated by the proposed project would not cause the LOS to degrade to unacceptable levels (LOS E or F) at any of the supplemental study intersections under Existing Plus Proposed Project. Under 2030 Cumulative Conditions, traffic volumes are projected to substantially increase throughout the study area, resulting in noticeable increases in the average delays per vehicle at the five supplemental study intersections. Overall, there would be significant cumulative traffic impacts due to anticipated background traffic growth which would result in a LOS of E or F at all five supplemental study intersections under 2030 Cumulative Conditions.

Table C&R.1: Intersection LOS for Supplemental Intersections – Existing Plus Proposed Project

Intersection	Existing Conditions		Existing Plus Project Conditions		Cumulative Conditions	
	LOS	Delay	LOS	Delay	LOS	Delay
Third Street/Mission Street	C	22.8	C	23.0	**E**	**69.1**
With Transit Lane Enforcement	*D*	*52.0*	*D*	*52.8*	***F***	***>80.0***
Third Street/Folsom Street	D	46.1	D	49.2	**F**	**>80.0**
Seventh Street/Mission Street	C	27.5	C	28.1	**E**	**68.6**
With Transit Lane Enforcement	*D*	*46.8*	*D*	*47.4*	***F***	***>80.0***
Seventh Street/Folsom Street	C	28.7	C	29.7	**F**	**>80.0**
Eighth Street/Folsom Street	C	23.6	C	25.3	**E**	**59.9**

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; Italics indicate conditions with the enforcement of the transit-only lanes on Mission Street.

Source: AECOM, May 2010

SOURCE: AECOM

CITYPLACE
2005.1074E

FIGURE C&R.1: ORIGINAL STUDY INTERSECTIONS AND SUPPLEMENTAL STUDY INTERSECTIONS

An evaluation of the proposed project's contribution to critical movements was conducted to determine whether or not the proposed project would have a cumulatively considerable contribution to the cumulative impacts at these intersections. At all five supplemental intersections, the proposed project would have a minimal contribution to the growth in traffic volumes from Existing to 2030 Cumulative Conditions. The proposed project's contribution to the critical movements at these intersections is summarized in Table C&R.2. Although the proposed project would add vehicles to poorly-operating critical movements at each location, the proposed project's contribution to the total volumes at these movements would be very low (between 0.3 percent and 3.1 percent). Therefore, the proposed project's traffic would not represent a cumulatively considerable contribution to the significant cumulative traffic impacts at the supplemental study intersections.

Table C&R.2: Contribution to Critical Movements at Supplemental Intersections – 2030 Cumulative Conditions Plus Proposed Project

Intersection	Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution to Critical Movement	Impact Y/N
Third Street /	NBT	F	5	0.3%	N
Mission Street	EBT	C	0	0.0%	
Third Street /	NBT	F	0	0.0%	N
Folsom Street	EBT	F	32	1.9%	
Seventh Street /	NBT	C	36	2.1%	N
Mission Street	EBT	F	0	0.0%	
Seventh Street /	NBT	F	0	0.0%	N
Folsom Street	EBT	C	62	3.1%	
Eighth Street /	SBT	C	23	1.6%	N
Folsom Street	EBT	F	29	1.6%	

Source: AECOM, May 2010

Existing and 2030 Cumulative Conditions Plus No Garage Alternative

As shown in Table C&R.3, traffic generated by the No Garage Alternative would not cause the LOS to degrade to unacceptable levels (LOS E or F) at any of the supplemental study intersections under Existing Plus No Garage Alternative with the exception of the Seventh Street/Mission Street intersection under Transit Lane Enforcement conditions. However, as stated in the *CityPlace Transportation Study*[4] (and also on EIR p. IV.46), unacceptable LOS as a result of transit lane enforcement would not be considered a significant impact in circumstances where it is not representative of actual conditions or directly related to a proposed project.

[4] *935-965 Market Street Transportation Study – Final Report*, October 28, 2009, prepared by AECOM. This report is available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

Table C&R.3: Intersection LOS for Supplemental Intersections – No Garage Alternative

Intersection	Existing Conditions		Existing Plus No Garage Alternative Conditions		2030 Cumulative Conditions	
	LOS	Delay	LOS	Delay	LOS	Delay
Third Street/Mission Street	C	22.8	C	22.9	**E**	**69.1**
With Transit Lane Enforcement	*D*	*52.0*	*D*	*54.4*	***F***	***>80.0***
Third Street/Folsom Street	D	46.1	D	48.5	**F**	**>80.0**
Seventh Street/Mission Street	C	27.5	C	31.6	**E**	**68.6**
With Transit Lane Enforcement	*D*	*46.8*	*E*	*57.9*	***F***	***>80.0***
Seventh Street/Folsom Street	C	28.7	C	31.5	**F**	**>80.0**
Eighth Street/Folsom Street	C	23.6	C	25.3	**E**	**59.9**

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

Source: AECOM, May 2010

Under 2030 Cumulative Conditions, traffic volumes are projected to substantially increase throughout the study area, resulting in noticeable increases in the average delay per vehicle at the five supplemental study intersections. Overall, there would be significant cumulative traffic impacts due to anticipated traffic growth which would cause adverse LOS of E or F at all five supplemental study intersections under 2030 Cumulative Conditions. An evaluation of the No Garage Alternative's contribution to critical movements was conducted to determine whether or not the No Garage Alternative would have a cumulatively considerable contribution to significant cumulative impacts at these intersections. At all five supplemental intersections, the No Garage Alternative would have a minimal contribution to the growth in traffic volumes from Existing to 2030 Cumulative Conditions. The No Garage Alternative contributions to the critical movements at these intersections are summarized in Table C&R.4. Although the No Garage Alternative would add vehicles to poorly-operating critical movements at each location, the alternative's contribution to the total volumes at these movements would be very low (between 0.2 percent and 4.2 percent). Therefore, the No Garage Alternative's traffic would not represent a cumulatively considerable contribution to the significant cumulative impacts at any of the supplemental intersections.

Table C&R.4: Contribution to Critical Movements at Supplemental Intersections – 2030 Cumulative Conditions Plus No Garage Alternative

Intersection	Critical Movement	Critical Movement LOS	No Garage Alternative Vehicle Contribution to Critical Movement	Project % Contribution to Critical Movement
Third Street/Mission Street	NBT	F	4	0.2%
	EBT	C	0	0.0%
Third Street/Folsom Street	NBT	F	11	0.6%
	EBT	F	13	0.5%
Seventh Street/Mission Street	NBT	C	39	2.2%
	EBT	F	40	4.2%
Seventh Street/Folsom Street	NBT	F	16	0.9%
	EBT	C	0	0.0%
Eighth Street/Folsom Street	SBT	C	3	0.2%
	EBT	F	0	0.0%

Source: AECOM, May 2010

Existing and 2030 Cumulative Conditions Plus Reduced Parking Variant

The Reduced Parking Variant of the No Garage Alternative (Reduced Parking Variant) has been added to the EIR to provide transportation information on an intermediate scenario between the Proposed Project's two-level parking garage and the No Garage Alternative. The Reduced Parking Variant was analyzed at the 10 original study intersections and at the Stockton Street/O'Farrell Street intersection that was added to the original alternative analysis for the No Garage Alternative, as well as at the five supplemental study intersections in the *Supplemental Transportation Analysis*. The results of the analysis are summarized here and are included in Section D. Draft EIR Text Changes for Chapter VI, Alternatives.

Intersection LOS would not degrade from acceptable to unacceptable levels (LOS E or F) at any of the original or supplemental study intersections in the Existing Plus Reduced Parking Variant scenario, and would not contribute substantially to further degradation at the intersection of Fourth Street/Market Street, which operates at LOS F under existing conditions (see Table C&R.5). At the Fifth Street/Stevenson Street intersection under Existing plus Reduced Parking Variant conditions the LOS would be D and there would be no significant impact.

Table C&R.5: Intersection LOS – Existing Plus Reduced Parking Variant of the No Garage Alternative

	Intersection	Existing Conditions		Existing Plus Project		Existing Plus No Garage Alternative		Existing Plus Reduced Parking Variant		Impact Y/N
		LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	
1.	Fourth/Market	**F**	**>80.0**	F	**>80.0**	**F**	**>80.0**	**F**	**>80.0**	N
	With Enforcement	***F***	***>80.0***	***F***	***>80.0***	***F***	***>80.0***	***F***	***>80.0***	
2.	Fourth/Mission	C	28.7	C	29.0	C	28.9	C	28.9	N
	With Enforcement	*D*	*39.1*	*D*	*39.7*	*D*	*39.3*	*D*	*39.7*	
3.	Fifth/Market	C	27.0	C	28.6	C	27.4	C	27.4	N
	With Enforcement	*C*	*28.2*	*C*	*30.1*	*C*	*28.6*	*C*	*28.6*	
4.	Fifth/Stevenson[a]	D	27.6	**E**	**44.1**	D	27.3	D	27.5	N
5.	Fifth/Mission	C	29.5	D	40.9	D	31.0	D	31.2	N
	With Enforcement	*C*	*31.8*	*D*	*43.5*	*D*	*33.4*	*D*	*33.4*	
6.	Fifth/Howard	C	22.3	C	25.2	C	26.8	C	24.8	N
7.	Sixth/Market	C	29.1	C	30.2	C	29.4	C	29.2	N
	With Enforcement	*C*	*31.0*	*C*	*32.2*	*C*	*31.2*	*C*	*31.2*	
8.	Sixth/Stevenson	C	21.9	C	22.0	C	22.0	C	22.0	N
9.	Sixth/Mission	D	36.7	D	39.1	D	39.7	D	37.7	N
	With Enforcement	*D*	*40.8*	*D*	*42.9*	*D*	*48.3*	*D*	*51.8*	
10.	Fourth/Howard	D	38.8	D	39.4	D	51.5	D	43.3	N
	Stockton/O'Farrell	C	28.3	C	32.8	C	34.1	C	29.1	N
	Third/Mission	C	22.8	C	23.0	C	22.9	C	22.8	N
	With Enforcement	*D*	*52.0*	*D*	*52.8*	*D*	*54.4*	*D*	*54.1*	
	Third/Folsom	D	46.1	D	49.2	D	48.5	D	47.7	N
	Seventh/Mission	C	27.5	C	28.1	C	31.6	C	29.2	N
	With Enforcement	*D*	*46.8*	*D*	*47.4*	*E*	*57.9*	*D*	*50.8*	
	Seventh/Folsom	C	28.7	C	29.7	C	31.5	C	30.2	N
	Eighth/Folsom	C	23.6	C	25.3	C	25.3	C	23.7	N

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] Stevenson at Fifth Street and Sixth Street were analyzed as unsignalized intersections.

Source: AECOM, October 2009 and May 2010.

As explained in the Draft EIR in Section IV.C, Transportation and Circulation, in "Cumulative Traffic Impacts" on pp. IV.C.45 to IV.C.46, many of the study intersections would operate at unacceptable LOS in the future because of substantial growth in traffic volumes. Therefore, there would be significant cumulative impacts at these locations in the future. Under 2030 Cumulative Conditions, the Reduced Parking Variant would contribute traffic to many of the study intersections (at both original and supplemental locations - see Table C&R.6). However, the contributions to critical movements at all but one of these intersections would be minor, and would not represent a cumulatively considerable contribution to the significant cumulative impacts at any of these intersections except for the Fifth Street/Stevenson Street intersection. At this intersection, the Reduced Parking Variant would contribute considerably to the significant

cumulative impact, like the proposed project but unlike the No Garage Alternative. Furthermore, and in contrast to the No Garage Alternative, the Reduced Parking Variant would not have a cumulatively considerable contribution to the significant impact at the Fourth Street/Howard Street intersection. Also, in contrast to the proposed project, the Reduced Parking Variant would not have a cumulatively considerable contribution to the significant impact at the Fifth Street/Mission Street intersection.

Table C&R.6: Contribution to Critical Movements – 2030 Cumulative Conditions Plus Reduced Parking Variant

Intersection		Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
1.	Fourth Street/Market Street	SBT EBT	F D	6 0	0.4 0.0	N
3.	Fifth Street/Market Street	NBT EBT	F F	2 0	0.2 0.0	N
4.	Fifth Street/Stevenson Street	EBL EBR	F C	5 32	15.6 27.8	Y
5.	Fifth Street/Mission Street	SBT EBT	F E	32 27	4.5 3.6	N
6.	Fifth Street/Howard Street	NBT WBT	F D	20 26	2.2 1.6	N
7.	Sixth Street/Market Street	NBT EBT	F C	2 0	0.1 0.0	N
9.	Sixth Street/Mission Street	SBT EBT	F C	0 27	0.0 3.4	N
10.	Fourth Street/Howard Street	SBR WBT	F D	27 16	4.5 1.0	N
	Stockton Street/O'Farrell Street	SBT EBT	D E	3 0	0.2 0.0	N
	Third Street/Mission Street	NBT EBT	F C	2 0	0.1 0.0	N
	Third Street/Folsom Street	NBT EBT	F F	11 6	0.6 0.4	N
	Seventh Street/Mission Street	NBT EBT	C F	20 20	1.1 2.7	N
	Seventh Street/Folsom Street	NBT EBT	F C	7 0	0.4 0.0	N
	Eighth Street/Folsom Street	SBT EBT	C F	10 0	0.7 0.0	N

Notes:
[a] NBT = Northbound Turn; EBT = Eastbound Turn; EBL = Eastbound Left; EBR = Eastbound Right; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right
Source: AECOM, May 2010

In summary, the Reduced Parking Variant would not generate any new significant impacts compared to those of the proposed project, would avoid the project-specific significant impact at the Fifth Street/Stevenson Street intersection caused by the proposed project, and would avoid the significant cumulative impact at the intersection of Fourth Street/Howard Street that would result with the No Garage Alternative and the significant cumulative impact at the intersection of Fifth Street/Mission Street that would result with the proposed project. However, there would still be a significant cumulative impact at the Fifth Street/Stevenson Street intersection.

The *Supplemental Transportation Analysis*, covering an expanded study area, did not identify any additional transportation impacts with respect to transit, parking, loading, pedestrians, bicycles, or construction due to the proposed project or any of the alternatives.

A separate technical memorandum which presented the transportation analysis for the Reduced Intensity Alternative was completed in October 2009 and summarized in Chapter VI, Alternatives of the DEIR (EIR pp. VI.4-VI.8).[5] The results indicated that there would be a significant cumulative traffic impact at the intersection of Fifth and Mission Streets with the Reduced Intensity Alternative, but no other transportation impacts. With about half of the land use program, the Reduced Intensity Alternative would result in about half the peak period trip generation as the proposed project. This would be expected to result in fewer impacts than those identified for either the proposed project or the No Garage Alternative and its Reduced Parking Variant. As explained above, the *Supplemental Transportation Analysis* shows that the proposed project would not cause significant impacts at any of the supplemental intersections; therefore, it may be inferred that the Reduced Intensity Alternative, with one half the vehicle trips, also would not cause significant impacts in the expanded study area. Therefore, this alternative was not evaluated further with respect to the expanded transportation study area.

Draft EIR Text Changes

Text changes made to the Draft EIR to add the results of the *Supplemental Transportation Analysis* are shown below and in Section D, Draft EIR Text Changes for Chapter IV and Chapter VI of the Draft EIR. Revisions or additions to EIR text are shown as indented text. New or revised text is underlined; deleted material is shown as ~~strikethrough~~ text.

[5] AECOM. October 26, 2009. *Supplementary Impact Analysis – CityPlace Reduced Intensity Alternative.* This technical memorandum is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

Section IV.C, Transportation and Circulation

The first paragraph on EIR p. IV.C.1 is revised to read:

> This section summarizes and incorporates the results of a transportation impact analysis (TIA) prepared by an independent transportation consultant for the proposed retail development at 935-965 Market Street.[1] The TIA describes existing and future (2030) transportation conditions (roadway traffic, transit, pedestrian, bicycle, parking, and loading) in the vicinity of the ~~proposed~~ project site and evaluates its environmental effects. A supplemental transportation study was conducted as a result of Comments on the Draft EIR, and the results are incorporated below.[2]
>
> [1] The information in this section is from the *935-965 Market Street Transportation Study – Final Report*, October 28, 2009, prepared by AECOM (hereafter *Transportation Study*). This report is on file and available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, in Case File Number 2005.1074E.

A new footnote is added on EIR p. IV.C.1 to reference the *Supplemental Transportation Analysis*. Footnote numbers in Section IV.C have been revised to account for the insertion.

> [2] AECOM, May 5, 2010, *CityPlace Transportation Study - Results of Supplemental Traffic and Pedestrian Analysis* (hereafter *Supplemental Transportation Analysis*). This report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

The first sentence in the second paragraph on EIR p. IV.C.1 is revised to read:

> The TIA established a study area around the project site for traffic, transit, and parking analyses which was expanded in response to comments as described above (see Figure IV.C.1: Expanded Transportation Study Area and Intersection Analysis Locations (Revised)).

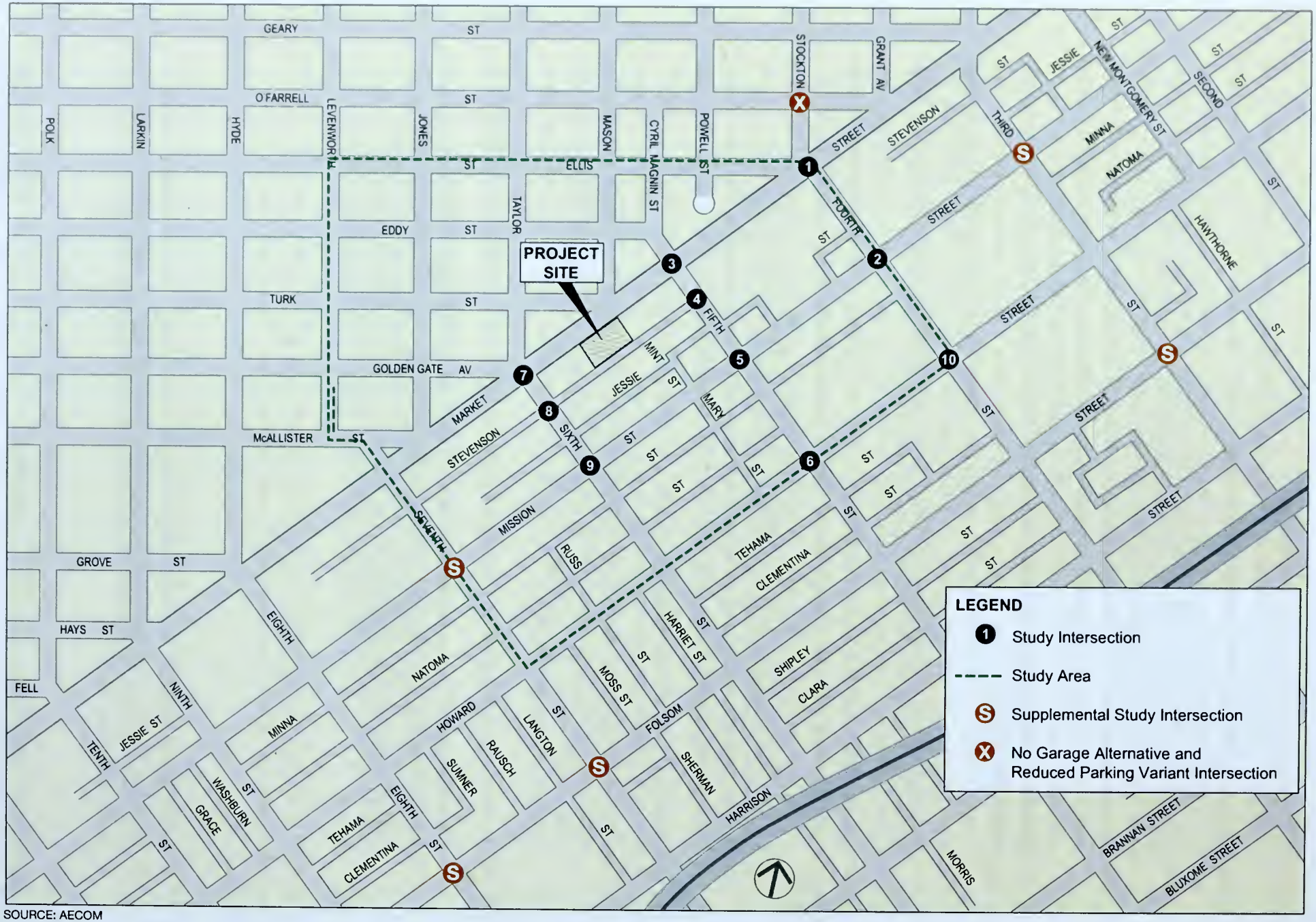
The following text is added after the second paragraph on EIR p. IV.C.1:

> Revised Figure IV.C.1: Transportation Study Area and Intersection Analysis Locations shows the expanded transportation study area. The supplemental study intersections are Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street.

Figure IV.C.1: Transportation Study Area and Intersection Analysis Locations, on EIR p. IV.C.2, has been revised to include the supplemental study intersections. The revised figure is shown on p. C&R.18.

The following text is added after the first paragraph on EIR p. IV.C.6:

> Existing conditions for the supplemental study intersections are presented in revised Table IV.C.1.



SOURCE: AECOM

CITYPLACE
2005.1074E

FIGURE IV.C.1: EXPANDED TRANSPORTATION STUDY AREA AND INTERSECTION ANALYSIS LOCATIONS (REVISED)

Table IV.C.1: Intersection LOS – Existing Conditions, on EIR p. IV.C.6, is revised to add the five supplemental study intersections.

Table IV.C.1: Intersection LOS – Existing Conditions[a] (Revised)

Intersection	Traffic Control	Existing Conditions	
		LOS	Delay
1. Fourth Street/Market Street	Signalized	**F**	**>80.0**
With Transit Lane Enforcement		***F***	***>80.0***
2. Fourth Street/Mission Street	Signalized	C	28.7
With Transit Lane Enforcement		*D*	*39.1*
3. Fifth Street/Market Street	Signalized	C	27.0
With Transit Lane Enforcement		*C*	*28.2*
4. Fifth Street/Stevenson Street	One-Way Stop-Controlled	D	27.6
5. Fifth Street/Mission Street[b]	Signalized	C	29.5
With Transit Lane Enforcement		*C*	*31.8*
6. Fifth Street/Howard Street	Signalized	C	22.3
7. Sixth Street/Market Street	Signalized	C	29.1
With Transit Lane Enforcement		*C*	*31.0*
8. Sixth Street/Stevenson Street	One-Way Stop-Controlled	C	21.9
9. Sixth Street/Mission Street	Signalized	D	36.7
With Transit Lane Enforcement		*D*	*40.8*
10. Fourth Street/Howard Street	Signalized	D	38.8
Third Street/Mission Street	Signalized	C	22.8
With Transit Lane Enforcement		*D*	*52.0*
Third Street/Folsom Street	Signalized	D	46.1
Seventh Street/Mission Street	Signalized	C	27.5
With Transit Lane Enforcement		*D*	*46.8*
Seventh Street/Folsom Street	Signalized	C	28.7
Eighth Street/Folsom Street	Signalized	C	23.6

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] During field observations, queues formed at each of the study intersections and the Market and Mission Street transit-only lanes were used primarily by transit vehicles with occasional encroachment by other vehicles.

[b] The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At the time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the San Francisco Bicycle Plan EIR.

Source: AECOM, October 2009 and May 2010

Table IV.C.7: Intersection LOS – Existing Plus Project Conditions, on EIR p. IV.C.27, is revised to add the five supplemental study intersections.

Table IV.C.7: Intersection LOS – Existing Plus Project Conditions (Revised)

	Intersection	Existing Conditions		Existing Plus Project		Impact Y/N
		LOS	Delay	LOS	Delay	
1.	Fourth Street/Market Street	**F**	**>80.0**	F	**>80.0**	N
	With Transit Lane Enforcement	*F*	*>80.0*	*F*	*>80.0*	
2.	Fourth Street/Mission Street	C	28.7	C	29.0	N
	With Transit Lane Enforcement	*D*	*39.1*	*D*	*39.7*	
3.	Fifth Street/Market Street	C	27.0	C	28.6	N
	With Transit Lane Enforcement	*C*	*28.2*	*C*	*30.1*	
4.	Fifth Street/Stevenson Street[a]	D	27.6	**E**	**44.1**	**Y**
5.	Fifth Street/Mission Street	C	29.5	D	40.9	N
	With Transit Lane Enforcement	*C*	*31.8*	*D*	*43.5*	
6.	Fifth Street/Howard Street	C	22.3	C	25.2	N
7.	Sixth Street/Market Street	C	29.1	C	30.2	N
	With Transit Lane Enforcement	*C*	*31.0*	*C*	*32.2*	
8.	Sixth Street/Stevenson Street	C	21.9	C	22.0	N
9.	Sixth Street/Mission Street	D	36.7	D	39.1	N
	With Transit Lane Enforcement	*D*	*40.8*	*D*	*42.9*	
10.	Fourth Street/Howard Street	D	38.8	D	39.4	N
	Third Street/Mission Street	C	22.8	C	23.0	N
	With Transit Lane Enforcement	*D*	*52.0*	*D*	*52.8*	
	Third Street/Folsom Street	D	46.1	D	49.2	N
	Seventh Street/Mission Street	C	27.5	C	28.1	N
	With Transit Lane Enforcement	*D*	*46.8*	*D*	*47.4*	
	Seventh Street/Folsom Street	C	28.7	C	29.7	N
	Eighth Street/Folsom Street	C	23.6	C	25.3	N

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] Stevenson at Fifth Street and Sixth Street were analyzed as unsignalized intersections.

Source: AECOM, October 2009 and May 2010.

Text is added to the second sentence in the first paragraph, on EIR p. IV.C.27, to reflect the results of the supplemental traffic analysis for the Existing Plus Project conditions:

> The Fourth Street/Market Street intersection is the only intersection that operates at LOS F under the Existing Plus Project Conditions scenario (with and without transit lane enforcement). All other intersections including the supplemental study intersections operate at acceptable conditions. Under the Existing Plus Project scenario, all study intersections would continue to operate with acceptable Levels of Service with the exception of the Fourth Street/Market Street (with and without transit lane enforcement) and Fifth Street/Stevenson Street intersections.

The third sentence in the first paragraph, on EIR p. IV.C.45, is revised to add the five supplemental study intersections for 2030 Cumulative Conditions.

> Overall, ~~seven~~ 12 of the ~~10~~ 15 study intersections, including the supplemental study intersections, would operate with unacceptable service levels (LOS E or F) under 2030 Cumulative Conditions during the weekday PM peak hour; therefore there would be significant cumulative traffic impacts in the future.

Table IV.C.8: Intersection LOS – 2030 Cumulative Conditions, on EIR p. IV.C.45, is revised to add the five supplemental study intersections.

Table IV.C.8: Intersection LOS – 2030 Cumulative Conditions (Revised)

Intersection		Existing Conditions		Existing Plus Project Conditions		2030 Cumulative Conditions	
		LOS	Delay	LOS	Delay	LOS	Delay
1.	Fourth Street/Market Street	**F**	**>80.0**	**F**	**>80.0**	**F**	**>80.0**
	With Transit Lane Enforcement	*F*	*>80.0*	*F*	*>80.0*	*F*	*>80.0*
2.	Fourth Street/Mission Street	C	28.7	C	29.0	D	43.0
	With Transit Lane Enforcement	*D*	*39.1*	*D*	*39.7*	*E*	*60.1*
3.	Fifth Street/Market Street	C	27.0	C	28.6	D	53.9
	With Transit Lane Enforcement	*C*	*28.2*	*C*	*30.1*	*E*	*57.8*
4.	Fifth Street/Stevenson Street[a]	D	27.6	**E**	**44.1**	**E**	**49.1**
5.	Fifth Street/Mission Street	C	29.5	D	40.9	**E**	**77.2**
	With Transit Lane Enforcement	*C*	*31.8*	*D*	*43.5*	*E*	*77.9*
6.	Fifth Street/Howard Street	C	22.3	C	25.2	**E**	**77.9**
7.	Sixth Street/Market Street	C	29.1	C	30.2	**E**	**70.3**
	With Transit Lane Enforcement	*C*	*31.0*	*C*	*32.2*	*E*	*77.4*
8.	Sixth Street/Stevenson Street	C	21.9	C	22.0	D	26.8
9.	Sixth Street/Mission Street	D	36.7	D	39.1	**E**	**66.8**
	With Transit Lane Enforcement	*D*	*40.8*	*D*	*42.9*	*F*	*>80.0*
10.	Fourth Street/Howard Street	D	38.8	D	39.4	**E**	**68.2**
	Third Street/Mission Street	C	22.8	C	23.0	**E**	**69.1**
	With Transit Lane Enforcement	*D*	*52.0*	*D*	*52.8*	*F*	*>80.0*
	Third Street/Folsom Street	D	46.1	D	49.2	**F**	**>80.0**
	Seventh Street/Mission Street	C	27.5	C	28.1	**E**	**68.6**
	With Transit Lane Enforcement	*D*	*46.8*	*D*	*47.4*	*F*	*>80.0*
	Seventh Street/Folsom Street	C	28.7	C	29.7	**F**	**>80.0**
	Eighth Street/Folsom Street	C	23.6	C	25.3	**E**	**59.9**

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] Stevenson Street at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

[b] The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At that time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the San Francisco Bicycle Plan EIR.

Source: AECOM, October 2009 and May 2010.

Text is added to the end of the bulleted list on EIR p. IV.C.46 to include the five supplemental study intersections for 2030 Cumulative Conditions.

- The Third Street/Mission Street intersection would worsen from LOS C to LOS F.
- The Third Street/Folsom Street intersection would worsen from LOS D to LOS F.
- The Seventh Street/Mission Street intersection would worsen from LOS C to LOS E.
- The Seventh Street/Folsom Street intersection would worsen from LOS C to LOS F.
- The Eighth Street/Folsom Street intersection would worsen from LOS C to LOS E.

The first sentence in the first paragraph on EIR p. IV.C.47 is revised to reflect the results of the supplemental traffic analysis for the proposed project for 2030 Cumulative Conditions.

> All ~~seven~~ 13 study intersections would experience increases in cumulative traffic volumes due to anticipated background traffic growth ~~causing the~~ that would result in deterioration of LOS ~~to worsen~~ to LOS E or F under 2030 Cumulative Conditions.

Text is added after the second sentence in the first paragraph on EIR p. IV.C.47 to reflect the results of the supplemental traffic analysis for the proposed project for 2030 Cumulative Conditions.

> At the intersections added for the supplemental traffic analysis, the proposed project would generally have a minimal contribution to the growth in traffic volumes from Existing to 2030 Cumulative.

Text is added to the end of the second to last sentence in the first paragraph on EIR p. IV.C.47 to reflect the results of the supplemental traffic analysis for the proposed project for 2030 Cumulative Conditions.

> The proposed project would contribute little or no traffic to the critical movements at the Fourth Street/Market Street, Fifth Street /Howard Street, Sixth Street/Market Street, Sixth Street/Mission Street, and Fourth Street/Howard Street intersections, or at any of the supplemental intersections as presented in Table IV.C.10 (Revised).

Table IV.C.10: Contribution to Critical Movements – 2030 Cumulative Conditions, on EIR p. IV.C.48, is revised to add the five supplemental intersections. The revised table is shown on p. C&R.23.

Table IV.C.10: Contribution to Critical Movements – 2030 Cumulative Conditions (Revised)

Intersection		Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
1.	Fourth Street/Market Street	SBT EBT	F F	0 2	- 0.4	N
4.	Fifth Street/Stevenson Street	EBL EBR	F E	13 135	35.1 63.7	Y
5.	Fifth Street /Mission Street	SBT EBT	F D	104 0	12.5 -	Y
6.	Fifth Street /Howard Street	NBT WBT	F C	0 12	- 0.8	N
7.	Sixth Street/Market Street	NBT EBT	F D	14 6	1.0 1.5	N
9.	Sixth Street/Mission Street	SBT EBT	F D	0 0	- -	N
10.	Fourth Street /Howard Street	SBR WBT	F D	7 12	1.4 0.8	N
	Third Street/Mission Street	NBT EBT	F C	5 0	0.3 0.0	N
	Third Street/Folsom Street	NBT EBT	F F	0 32	0.0 1.9	N
	Seventh Street/Mission Street	NBT EBT	C F	36 0	2.1 0.0	N
	Seventh Street/Folsom Street	NBT EBT	F C	0 62	0.0 3.1	N
	Eighth Street/Folsom Street	SBT	C	23	1.6	N

Notes:
[a] NBT = Northbound Turn; EBT = Eastbound Turn; EBL = Eastbound Left; EBR = Eastbound Right; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right
Source: AECOM, October 2009 and May 2010.

Chapter VI, Alternatives

The last sentence in the third full paragraph on EIR p. VI.10 is revised to reflect the inclusion of the supplemental study intersections.

> The intersection LOS results for the No Garage Alternative, including those for the supplemental traffic analysis, are summarized in Table VI.3.

The fourth full paragraph on EIR p. VI.10 is revised to reflect the inclusion of the supplemental study intersections.

> Except for the Fourth Street/Market Street intersection, all study intersections (including the two new locations and the five supplemental intersections) would continue to operate at acceptable conditions (LOS D or better) under the No Garage Alternative. Under the Existing Plus No Garage Alternative with transit lane enforcement the LOS at the Seventh Street / Mission Street intersection

would degrade to LOS E. However, the City does not consider unacceptable LOS during transit enforcement to be a significant impact in situations where it is not representative of actual conditions or directly related to the proposed project. The significant impact at the Fifth Street/Stevenson Street intersection that would occur under the proposed project would be eliminated under the No Garage Alternative.

Table VI.3: Intersection LOS – Existing plus No Garage Alternative Conditions on EIR p.VI.11 is revised to add the five supplemental intersections.

Table VI.3: Intersection LOS – Existing plus No Garage Alternative Conditions (Revised)

Intersection	Existing Conditions		Existing plus Project Conditions		Existing plus Project – No Garage Alternative Conditions	
	LOS	Delay	LOS	Delay	LOS	Delay
1. Fourth/Market	**F**	**>80.0**	**F**	**>80.0**	**F**	**>80.0**
With Enforcement	***F***	***>80.0***	***F***	***>80.0***	***F***	***>80.0***
2. Fourth/Mission	C	28.7	C	29.0	C	28.9
With Enforcement	*D*	*39.1*	*D*	*39.7*	*D*	*39.3*
3. Fifth/Market	C	27.0	C	28.6	C	27.4
With Enforcement	*C*	*28.2*	*C*	*30.1*	*C*	*28.6*
4. Fifth/Stevenson[a]	D	27.6	**E**	**44.1**	D	27.3
5. Fifth/Mission[b]	C	29.5	D	40.9	D	31.0
With Enforcement	*C*	*31.8*	*D*	*43.5*	*D*	*33.4*
6. Fifth/Howard	C	22.3	C	25.2	C	26.8
7. Sixth/Market	C	29.1	C	30.2	C	29.4
With Enforcement	*C*	*31.0*	*C*	*32.2*	*C*	*31.2*
8. Sixth/Stevenson[a]	C	21.9	C	22.0	C	22.0
9. Sixth/Mission	D	36.7	D	39.1	D	39.7
With Enforcement	*D*	*40.8*	*D*	*42.9*	*D*	*48.3*
10. Fourth/Howard	D	38.8	D	39.4	D	51.5
11. Stockton/O'Farrell	C	32.5	C	32.8	C	34.1
Third/Mission	C	22.8	C	23.0	C	22.9
With Enforcement	*D*	*52.0*	*D*	*52.8*	*D*	*54.4*
Third/Folsom	D	46.1	D	49.2	D	48.5
Seventh/Mission	C	27.5	C	28.1	C	31.6
With Enforcement	*D*	*46.8*	*D*	*47.4*	***E***	***57.9***
Seventh/Folsom	C	28.7	C	29.7	C	31.5
Eighth/Folsom	C	23.6	C	25.3	C	25.3

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes.

[a] Stevenson Street at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

[b] The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At the time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the *San Francisco Bicycle Plan EIR*.

Source: AECOM, October 2009 and May 2010

The first sentence of the last paragraph on EIR p. VI.13 is revised to reflect the results of the supplemental traffic analysis:

> There would be significant cumulative traffic impacts due to anticipated traffic growth which would cause or exacerbate adverse LOS E or F intersection operations at the following ~~seven~~ 12 study intersections under 2030 Cumulative Conditions Plus No Garage Alternative.

The bulleted list on EIR pp. VI.13-VI.14 is revised to add the five supplemental intersections.

> The following intersections would operate at LOS E or F under 2030 Cumulative conditions:
>
> - Fourth Street/Market Street;
> - Fifth Street/Mission Street;
> - Fifth Street/Howard Street;
> - Sixth Street/Market Street;
> - Sixth Street/Mission Street;
> - Fourth Street/Howard Street;~~ and~~
> - Stockton Street/O'Farrell Street;
> - Third Street/Mission Street;
> - Third Street/Folsom Street;
> - Seventh Street/Mission Street;
> - Seventh Street/Folsom Street; and
> - Eighth Street/Folsom Street.

The first sentence of the third paragraph on EIR p. VI.14 is revised to reflect the inclusion of the five supplemental study intersections:

> The ~~seven~~ 12 study intersections that would operate at LOS E or F under 2030 Cumulative Condition Plus No Garage Alternative were also reviewed using two different factors: the traffic generated by the alternative as a percent of total 2030 Cumulative traffic volumes, and as a percent of only the increase in traffic volumes between Existing and 2030 Cumulative conditions.

The fourth paragraph on EIR p. VI.14 is revised to reflect the results of the supplemental traffic analysis:

> At the Fourth Street/Market Street, Sixth Street/Market Street, ~~and~~ Stockton Street/O'Farrell Street, Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street intersections, the No Garage Alternative would make a minimal contribution ~~(between 0.3 and 3 percent)~~ to the growth in traffic volumes from Existing to 2030 Cumulative Conditions Plus No Garage

Alternative. Although the alternative would add vehicles to poorly-operating critical movements at each location (southbound through at Fourth Street/Market Street, northbound through at Sixth Street/Market Street, ~~and~~ southbound through at Stockton Street/O'Farrell Street, northbound through at Third Street/Mission Street, northbound and eastbound through at Third Street/Folsom Street, eastbound through at Seventh Street/Mission Street, northbound through at Seventh Street/Folsom Street, and eastbound through at Eighth Street/Folsom Street), the contribution to the total volumes at these movements would be very low (between 0.1 percent and ~~0.7~~ 4.2 percent). Therefore, traffic generated by the alternative would not represent a cumulatively considerable contribution to the significant cumulative traffic impacts at the Fourth Street/Market Street, Sixth Street/Market Street, ~~or~~ Stockton Street/O'Farrell Street, Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street intersections.

Table VI.5 on EIR p. VI.15 is revised to add the five supplemental study intersections:

Table VI.5: Contribution to Critical Movements under 2030 Cumulative Conditions – No Garage Alternative (Revised)

	Intersection	Critical Movement[a]	Critical Movement LOS	Vehicle Contribution to Critical Movement	Percent Contribution to Critical Movement
1.	Fourth/Market	SBT	F	11	0.7%
		EBT	F	0	0.0%
5.	Fifth/Mission	NBT	F	5	0.5%
		EBT	D	54	7.0%
6.	Fifth/Howard	NBT	F	40	4.4%
		WBL/WBT	D	53	3.1%
7.	Sixth/Market	NBT	F	2	0.1%
		EBT	D	0	0.0%
9.	Sixth/Mission	SBT	F	0	0.0%
		EBT	D	54	6.6%
10.	Fourth/Howard	SBR	F	63	11.1%
		WBT	D	22	1.4%
11.	Stockton/O'Farrell	SBT	D	4	0.3%
		EBT	E	0	0.0%
	Third/Mission	NBT	F	4	0.2%
		EBT	C	0	0.0%
	Third/Folsom	NBT	F	11	0.6%
		EBT	F	13	0.5%
	Seventh/Mission	NBT	C	39	2.2%
		EBT	F	40	4.2%
	Seventh/Folsom	NBT	F	16	0.9%
		EBT	C	0	0.0%
	Eighth/Folsom	SBT	C	3	0.2%
		EBT	F	0	0.0%

Notes:
[a] NBT = Northbound Turn; EBT = Eastbound Turn; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right

Source: AECOM, October 2009 and May 2010

2.2 Transportation Impacts Analysis Methodology: Travel Mode Split

Comments

"Re: Page IV.C.24 Mode Split: This paragraph uses 2002 C-3 District data to show mode splits by auto for work trips and non-work trips. This data is no longer appropriate because the current and future higher gasoline prices, tolls, and parking fees have already reduced driving as shown by the reduced utilization of parking at the nearby City owned garages. Future driving will also be reduced as San Francisco takes steps to comply with AB 32 and SB 375 and Metropolitan Transit Agency proposals are implemented to reduce the citywide driving modal split by fifty percent. The reduced garage patronage provides some guidance to determine current lower auto modem splits and the future changes can be estimated. Correcting the mode splits will also require correction of most of the numbers and tables that follow." *(Howard Strassner, Sierra Club San Francisco Group, December 16, 2009) [C-1]*

"If DEIRs do not include estimates of future reductions in the auto modal split the analysis, and what follows, could tend to enable additional driving." *(Howard Strassner, Sierra Club San Francisco Group, December 16, 2009) [C-3]*

Response

The commentor asserts that the use of the San Francisco Planning Department's October 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (*SF Guidelines*) methodology to determine travel mode split for the C-3 District does not reflect current or future travel behavior which is influenced by higher gasoline prices, road fees, parking fees, and proposed and/or future legislation. Travel demand information (in terms of trip generation, modal split and trip distribution) for the proposed project is based on the *SF Guidelines*. The *SF Guidelines* incorporate data for different portions of San Francisco, including the general downtown area (the C-3 District). These data were collected in an extensive survey effort and used to establish standard methodology for determining transportation-related impacts of proposed development projects. Please see EIR p. IV.C.24 for a discussion of the mode split for the proposed project.

The analysis of Existing Conditions and Existing Plus Project Conditions was based on the existing traffic counts conducted in September 2007 and calibrated based on observations of travel behavior at various times over the past three years. The future analysis was based on travel projections from the San Francisco County Transportation Authority's (SFCTA) travel demand model to year 2030, which takes into account future levels of development and the resulting travel characteristics expected throughout the city and the region. As a result, changes in trip generation rates, mode split, and trip distribution patterns are accounted for in these future projections.

Although the travel characteristics of the proposed project may change over time, for consistency purposes, the overall travel demand assumptions are fixed as they were developed by standard City methodology and modified based on observations of current travel behavior. The commentor presents no evidence to support changes in modal behavior. The *SF Guidelines* are the best tool available to quantify the travel demand and modal choices for a proposed development in downtown San Francisco. See also information provided in Response 2.3 - Transportation Impacts Analysis Methodology: Trip Generation.

2.3 Transportation Impacts Analysis Methodology: Trip Generation

Comment

"Historically DEIRs include estimates of future traffic based on projections by certain agencies. DEIRs should also include estimates of traffic reductions based on the impact of laws and agency proposals." *(Howard Strassner, Sierra Club San Francisco Group, December 16, 2009) [C-2]*

"1. The EIR modeled the number of trips generated, and the percentage of trips generated, for various alternatives, including both the developer's preferred alternative, with up to 280 parking spaces, as well as a no-garage alternative, with no parking spaces. Regardless of the amount of parking in the alternatives, the number of trips generated AND the number of auto trips generated by the project do not vary. This illustrates a fatal flaw in the Planning Department's Transportation Analysis guidelines - they cannot account for the effect of parking availability, or parking price, on travel behavior.

San Francisco's General Plan policies, as well as the Planning Code controls on parking in C-3 districts, are built on the understanding that additional parking generates additional auto trips:

> 'the amount and location of additional short term spaces allowed in the core should be carefully regulated. Short-term parking spaces attract more automobiles per day than long term spaces and do so during the midday periods when the number of traffic lanes is reduced by street parking and loading. Too much short-term parking would attract trips that otherwise would be made by transit and could add substantially to midday congestion.
>
> Additional short term spaces in the core should be created primarily by converting existing long-term spaces to short term spaces. This could be achieved by setting high rates on all day use and not providing weekly or monthly rates. In the case of new buildings short term spaces could be provided within the building to replace long and short term spaces displaced by the new development, if excessive congestion in the immediate vicinity will not result.' (Downtown Area Plan, Policy 20.7)
>
> 'A basic assumption of the Transportation Element is that a desirable living environment and a prosperous business environment cannot be maintained if traffic levels continue to increase in any significant way. A balance must be restored to the city's transportation system, and various methods must be used to control and reshape the impact of automobiles on the city. These include improving and promoting public transit, ridesharing, bicycling and walking as alternatives to the single-occupant automobile; limiting the city's parking capacity, especially long-term parking in commercial areas; directing major

> traffic movements to certain routes; and limiting the vehicular capacity of the city's streets and highways.' (Transportation Element)
>
> 'Land use controls that will lead to a sustainable mode split, and reduced congestion could include: Establishing parking caps for residential and commercial uses.' (Transportation Element, Policy 14.8)

The understanding that the cost and availability of parking influence travel behavior, and that more and cheaper parking induce additional auto trips, are the foundation of all contemporary parking management. This is based on the principle of supply and demand, which has been a fundamental principle of economic thought for at least two centuries. Yet the Planning Department's trip-generation models cannot adequately account for the differing travel behavior, and the differing transportation impacts, caused by traffic congestion.

Additional traffic congestion will slow public transit in the plan area, and will degrade bicycle safety and access, and must be accounted for accurately." *(Tom Radulovich, Livable City, December 21, 2009) [H-2]*

"1. The DEIR presents a flawed estimate of automobile trips associated with the project, predicting as many new auto trips for the No Garage Alternative as for the proposed project:

> The project-related demand for parking and loading under the No Garage Alternative would be the same as that for the proposed project. (DEIR, page VI.9)

This assertion casts strong doubt on the trip generation and assignment methodology utilized in preparing this DEIR (assumptions developed by the San Francisco Planning Department and published in the Transportation Impact Analysis Guidelines for Environmental Review, October 2002). Provision of any new auto parking in the project will contribute to an existing surplus of generally available auto parking in the vicinity of the project:

> (T)he three largest facilities - the Fifth/Mission Garage, the Ellis/O'Farrell Garage, and the Union Square Garage - all operate with a surplus of available spaces. Overall, there are over 5,800 offstreet parking spaces in the vicinity of the project site; about 1,500 of these were unoccupied at the time of the parking survey. (DEIR, page IV.C.17)

Such an increase in auto parking supply by the proposed project can be reasonably expected to attract new auto trips to the project area (indeed, a growing body of research and evidence substantiates just such an auto trip generation effect), but the DEIR makes no distinction in 'parking demand' between the addition of hundreds of new auto parking spaces and the omission of any new auto parking. The DEIR must present a more responsible account of the true need for, and likely effects of, auto parking in the project." *(Andy Thornley, San Francisco Bicycle Coalition December 21, 2009) [I-1]*

Response

The commentors assert that the current methodologies established by the San Francisco Planning Department to estimate project-related vehicle trips for existing and cumulative scenarios for the proposed project and its alternatives do not accurately account for the effects of increased parking supply on trip generation. In addition, the commentors assert that with the provision of parking, additional trips would result in traffic congestion that has not been adequately analyzed. Pursuant to the San Francisco Planning Department's October 2002 *Transportation Impact Analysis*

Guidelines for Environmental Review (*SF Guidelines*) methodology, the travel demand for a development project is based on its land uses (such as square footage of retail use or number of residential units), not its proposed parking supply, availability, or location. There are numerous factors that affect mode choice and trip generation, including such things as parking availability, transit availability, gas prices, and even weather. The *SF Guidelines* were developed to create a detailed set of rates and percentages to implement a consistent approach for all transportation studies to identify the travel demand generated by a proposed project.

Based on the *SF Guidelines* methodology, once the overall travel demand for the proposed project was calculated, it was split among all available modes of travel (such as auto, transit, bicycle, walk, and other modes). The percentage of trips for each travel mode was based on historic rates as documented in the *SF Guidelines*. The number of trips that were assigned to private auto was then distributed to the proposed project's parking garage and the other major parking facilities in the area (Fifth/Mission Garage, Ellis/O'Farrell Garage and Union Square Garage). Although parking availability and supply has an effect on travel behavior, the research and data used to develop the travel demand rates in the *SF Guidelines* are considered by the Planning Department to be appropriate for calculating travel demand for the proposed project and its alternatives. Use of standardized, documented data for downtown San Francisco conditions is appropriate for this project because, independent of the amount of parking provided onsite, travel behavior would be affected by both the substantial amount of offsite parking nearby and by the combined effects of traffic congestion and excellent transit availability.

The cumulative conditions analysis was based on travel projections from the San Francisco County Transportation Authority's (SFCTA) travel demand model to year 2030, which takes into account future levels of development and the resulting travel characteristics expected throughout the City and the region. As a result, changes in trip generation rates, mode split and trip distribution patterns are accounted for in these future projections. (See also Response 2.2 - Transportation Impacts Analysis Methodology: Travel Mode Split.)

Based on historical data of nearby garages and the off-street parking supply survey conducted as part of the transportation study, it was determined that there is adequate parking supply available throughout the study area to meet the proposed project's anticipated parking demand. The lack of parking at the project site would not substantially affect the mode choice of employees or patrons of the proposed project. A discussion of the existing parking conditions is provided on EIR pp. IV.C.17-IV.C.19. See also Response 2.4 - Transportation Impacts Analysis Methodology: Parking Impacts Analysis – Weekend and Holiday Data and Response 2.5 - Parking Impacts Analysis: Parking Supply and Demand for additional information regarding parking impact analysis.

Note that potential traffic impacts on public transit and bicycle travel are discussed on EIR pp. IV.C.32 to IV.C.33 and IV.C.36 to IV.C.37, as well as in Response 2.7 - Transportation Impacts Analysis Methodology: Bicycle Impacts Analysis.

2.4 Transportation Impacts Analysis Methodology: Parking Impacts Analysis – Weekend and Holiday Data

Comment

"All the parking analysis is based on data for a typical weekday. They are interesting numbers/ methodology. But of course maximum parking demand and impacts do not occur on a typical weekday. Instead maximum retail demand occurs on Saturdays, not weekdays. And then seasonally of course it peaks during the one month-plus Holiday shopping period. All peak load/ impact analysis should address these conditions instead. This is not just an environmental impact question, it is also an economic impact question since Saturdays and the Holiday season account for a greatly disproportionate share of retail sales volume, and parking/ traffic trouble then could seriously hurt the City's economy.

It is empirically clear that existing parking facilities fill up often during the holiday season. Last Saturday the 12th I observed that the mid-afternoon queue for the Fifth / Mission Garage was backed up southward on Fifth all the way to Harrison Street, and on Howard all the way back to Fourth St. Next Saturday it will be even worse. But the artificially narrowed DEIR tally totally fails to capture this real world situation. And we are now in an economic recession, whereas during growth years the shopping traffic and parking demand was in the past and will be in the future greater beyond any doubt – just check the Fifth/Mission Garage records from earlier this decade. These 2008-09 stats are artificially depressed due to the current recession and need to be adjusted upward for 'average' economic conditions. *(John Elberling, The Yerba Buena Consortium, December 16, 2009) [F-1a]*

Response

The commentor asserts that the peak parking occupancy at garage facilities near the project site occurs on weekends and during holiday periods, and that the parking analysis should be conducted for the peak demand that occurs during these periods. During the holiday season, when retail activity is at its peak, parking and traffic in the downtown area is noticeably more congested. However, the holiday retail peak is a short-term, temporary condition, and increasing parking to accommodate this peak activity would result in an over-abundance of available parking during non-holiday time periods. Based on the methodology provided in the *SF Guidelines*, the peak period of parking demand evaluated in a transportation study is the weekday afternoon, typically between 1:00 PM and 3:00 PM, which is the historic peak parking occupancy period on a typical day. Although the parking demand for some retail uses in downtown San Francisco is higher on weekends than on weekdays, the ambient parking demand from other uses such as office uses is substantially lower on weekends, leaving those spaces

available for weekend shoppers. Therefore, the weekday midday time period is the focus of the parking analysis.

San Francisco does not consider parking part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Secondary impacts have been accounted for in the analysis. The holiday period parking occupancy data is provided here for information purposes.

To better understand the demand for parking during weekends and holiday periods, parking occupancy data from the three closest parking facilities (Fifth/Mission, Ellis/O'Farrell, and Union Square Garages) for the months of November and December in the years 2006 to 2009 was collected and reviewed.[6] The collected data and summary documentation show the parking occupancy percentages and duration of parking at the Fifth/Mission, Ellis/O'Farrell, and Union Square Garages for each day during November and December.[7] These parking garages, similar to other large parking garages, have an effective capacity of between 90 and 95 percent of capacity; this accounts for the overall inefficiency of finding spaces.

The holiday season daily occupancy at the Fifth/Mission Garage has regularly been between 90 and 100 percent of capacity for continuous periods of one to three hours on weekend days during the four-year study period, with the number of occasions when occupancy was at or above 90 percent decreasing each year, from a high of segments of 24 out of 61 days in both 2006 and 2007 to segments of 9 out of 61 days in 2009. In 2009, when parking occupancy at the Fifth/Mission Garage was above 90 percent, the duration of such occupancy generally lasted for one to three hours during the daily period of peak parking demand (between 1:00 p.m. and 3:00 p.m.). Between 2006 and 2009, the Ellis/O'Farrell Garage often operated at over 90 percent capacity for continuous periods of one to five hours on weekend days. In 2009, the Ellis/O'Farrell Garage experienced a noticeable decline in the number of occasions when parking occupancy exceeded 90 percent, from a high of segments of 43 out of 61 days in 2008 to segments of 16 days in 2009. In 2009, when parking occupancy at the Ellis/O'Farrell Garage was above 90 percent, the duration of such occupancy generally lasted from one to five hours, extending beyond the typical period of peak parking demand. The Union Square Garage seldom operated at over 90 percent of capacity during the holiday months over the four-year study period; analysis results show that between 2006 and 2008 the parking garage never exceeded 90 percent. However, in 2009, there were segments of five days when parking occupancy at the

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[6] A *Parking Occupancy Comparison* spreadsheet was prepared by AECOM. This spreadsheet is on file and available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

[7] Data for the 61 calendar days in November and December was provided for the Fifth/Mission, Ellis/O'Farrell, and Union Square Parking Garages.

Union Square Garage was above 90 percent. The duration of such occupancy generally lasted from one to two hours.

As discussed, between 2006 and 2009 the Fifth/Mission and Ellis/O'Farrell Garages have operated at near capacity during the holiday season for several hours on weekends. The average daily peak occupancy at the Fifth/Mission Garage has decreased over the last two years of this four-year period, with less than half as many days of over 90 percent parking occupancy in 2009 (segments of 9 days) compared with 2006 or 2007 (segments of 24 days for each year). On a typical day in December 2006, the average daily peak occupancy at the Fifth/Mission Garage was approximately 83 percent. Over the course of the next three years, the average daily peak occupancy decreased to 79 percent in 2007, 73 percent in 2008, and 69 percent in 2009. The average daily peak occupancy during the holiday season at the Ellis/O'Farrell Garage remained steady between 2006 and 2008, with more than half of the November and December calendar days at or above 90 percent parking occupancy (an average of segments of 37 out of 61 possible days) and decreased noticeably in 2009. On a typical day in December 2006, the average daily peak occupancy at the Ellis/O'Farrell Garage was approximately 90 percent. Over the course of the next three years, the average daily peak occupancy decreased to 86 percent in 2007, increased to 94 percent in 2008, and decreased to 78 percent in 2009. This general downward trend is likely due to the economic recession. However, these changes to the average daily peak occupancy at these three parking facilities do not represent a substantial change in driver behavior when compared to other effects that influence travel demand. Without additional survey data and information about the other modes (i.e. availability of transit service), it cannot be inferred that the proposed project travel demand would follow the same trend.

The review of the weekend and holiday parking data provides some insight as to the trends in parking demand over the last four years as well as the seasonal peaking characteristics that occur during the holiday period. However, these results do not change the Draft EIR conclusion that the proposed project would not create any significant adverse impacts related to parking in the area.

2.5 Parking Impacts Analysis: Parking Supply and Demand

Comments

"Also on parking, there is an extensive study, I believe, in the EIR. But the language in almost every DEIR that we have ever seen referring to parking supply is not considered to be part of a permanent physical environment in San Francisco and that parking effects are considered to be social rather than impacts on the physical environment as defined by CEQA, I would like to know why that language isn't contained in the parking section and why it isn't a legitimate reason for rejecting parking in this case. I have this more detailed, and I will give it to the court reporter at the end of the hearing." *(Planning Commissioner Hisashi Sugaya, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/P-5]*

"Parking. Almost every DEIR has the following language: 'Parking-Parking supply is not considered to be a part of the permanent physical environment in San Francisco. Parking conditions are not static, as parking supply and demand varies day to night, day-to-day, month-to-month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines § 15131 (a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, may induce many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's – Transit First policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that – parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation.

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable.'

Doesn't this statement apply to the proposed project? If not, why not and is additional evaluation required?" *(Planning Commissioner Hisashi Sugaya, December 10, 2009) [E-6]*

"My only comment has to do with one item on Table 4C3, which has to do with the off-street parking and occupancy that is currently in the area. And in particular something such as the Fifth and Mission garage, which is something like 63 percent occupancy. That garage, even during better economic times and during the middle of holiday rush, has never been sold out. It is what, two blocks from the project. So although I am not commenting heavily on the rest of the project and on the EIR specifically, it is just that if you are going to have this tremendous increase of pedestrian traffic, that is exactly what we want and not necessarily a building that provides a great deal of parking that may not be necessary. And I will go into that further when the project comes up." *(Planning Commissioner Ron Miguel, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/O-2]*

"And while we are not talking about the specific merits of the different proposals, it has been raised, so we should say that, in fact, the study does project demand of about 480 parking spaces per day. And, you know, if it is – the project as proposed, of course, and the supply of 201 off-street parking places leaves a shortage of 279. And they go into talking about off-street parking. The on-street parking, of course, is very problematic. And I doubt you would be able to find very many places. But they did say that they analyzed 18 off-street parking facilities, and they found that there were 5,800 off-street parking places in the vicinity that would be close enough to conceivably walk. One of them is Union Square. It is a pretty good hike. And 1,500 of these were unoccupied at the time of the parking survey. So it seems as though the demand could be

met by the parking, but only if you supply the full required parking as proposed in the program. If you build the project without the parking, you are not going to meet the demand with the existing parking. And there are also a lot of problems with durable goods. Having to transport them any considerable distance is going to be very difficult to do. If you are carrying a television set, it probably is not easy to move it three or four blocks to your car." *(Planning Commissioner Michael Antonini, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/Q-2]*

"I just want to add a couple things. San Francisco's economy is really based mostly on tourism. And we have a drop in tourism. You notice the Convention Visitor Bureau pushed about town, which drives me to thinking where my issue is, which is about parking and walkability. And if you are from out of town, we get 18 million visitors. Not all of them come from out of state. Or they come from different parts of the Bay Area. You will need the parking there.

And regarding the Fifth Street garage, I would be surprised if it hasn't been sold out. I am pretty confident it's been sold out before. But if you look at the future growth of San Francisco and take us straight down to Market and Van Ness, and including Mission, the elimination of a lot of parking for some of the housing we have now, and if you really want to have outsiders come in here, besides tourists and people that spend the money -- and remember, our number-one job in development area is actually the tourist industry through the hotels, through the restaurants. And, frankly, I don't think that the EIR -- I agree with the EIR analysis. We are going to be short of the parking. When we have the opera, symphony and ballet, even people outside come in here, you can't get enough parking in that area which drives us down to the mid-Market area. And so I think the document is complete regarding the parking. And I think that -- I know it's going to be an issue, but if you want people from the Bay Area to come with business and spend their money, we are going to need the parking spaces.

And regarding whether or not Target comes here or not, if you carry bags, boxes, you have got to be able to drive them somewhere. If you are from out of town, you buy things, you want to be close to the parking." *(Planning Commissioner William Lee, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/R-1]*

"And I do think that parking, to comment on Mr. Radulovich's point in a newspaper article here which you probably all read, that parking is the antithesis of what we are trying to do with Market Street." *(Planning Commissioner Kathrin Moore, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/S-4]*

"Regarding: removal of 13 parking spaces on the south side of Stevenson Street. (pg IV.C.35) Has the proposed project studied the impact of the loss of the 13 metered parking spaces on Stevenson? Parking is already at a premium in San Francisco and much to the chagrin of activist-bike-coalitions; San Francisco residents still use their cars and need places to park them while shopping or while at work. Taking away existing parking would add to the problem unless it is as economical and convenient to park in a new parking structure." (*Laura Kennedy, December 7, 2009) [G-1]*

Response

Comments TR/P-5 and E-6 assert that certain San Francisco Planning Department text regarding parking supply and parking deficits is missing from the Draft EIR for this project. This language is included in the Draft EIR at the beginning of the environmental impacts discussion under

significance criteria on EIR pp. IV.C.21-IV.C.22 and in Footnote No. 10 on p. IV.C.22. Additionally, although it is true that a parking deficit is not generally considered an environmental impact under CEQA, neither would a parking surplus be considered an environmental impact. Instead, under either circumstance, the indirect parking impacts of the parking supply, such as delays to transit, queues extending into intersections, and underused land, are analyzed.

The transportation evaluation found that the parking garage as proposed for the project would not accommodate the proposed project's anticipated peak parking demand. There would be an unmet demand of 292 parking spaces during the weekday, mid-day peak period (see EIR p. IV.C.38).[8] All vehicles that could not be accommodated within the parking garage were assigned to the major nearby parking facilities (including the Fifth/Mission Garage, Ellis/O'Farrell Garage and Union Square Garage) based on their parking availability and distance to the project site. As stated in the Significance Criteria on EIR p. IV.C.21 and in the Transportation Study, parking supply and occupancy typically vary throughout the day and throughout the year. During the weekday midday analysis period, which represents typical current conditions, the Fifth/Mission Garage operates at about 63 percent of capacity during its peak occupancy, and the other facilities included in the off-street analysis operate at about 75 percent of capacity on average. As stated on EIR p. IV.C.38, there would not be a significant parking impact as a result of the proposed project. Please see Response 2.4: Transportation Impacts Analysis Methodology: Parking Impacts Analysis – Weekend and Holiday Data.

Comment TR/S-4 references an article in the *San Francisco Chronicle* which is attached herein as Appendix C for reference. The commentor supports an assertion in the article that the provision of parking at the project site would undo efforts to reduce vehicular traffic on Market Street and result in transit and bicycle impacts. The commentor states that parking is the antithesis of what the revitalization of Mid-Market area requires. Potential project impacts to transit and bicycles are analyzed on EIR pp. IV.C.31-IV.C.37. No significant impacts have been identified.

As part of the proposed project, 13 on-street parking spaces along Stevenson Street are proposed for elimination. As described on EIR pp. IV.C.41-IV.C.43, ten of these spaces would be removed to accommodate the Stevenson Street greening improvements and to provide access to the project's proposed loading dock as well as to facilitate access into and out of the proposed parking garage and loading dock. These on-street spaces on Stevenson Street are currently metered with 30-minute time limits. Based on field observations conducted for the parking analysis and repeated within the last six months, on-street parking spaces are typically available

[8] The unmet parking demand for the Proposed Project with 201 parking spaces was 279 spaces, and not 292 parking spaces. The 292 spaces referenced in the Draft EIR incorrectly included the loss of 13 on-street parking spaces on Stevenson Street, which are discussed on EIR pp. IV.C.41-IV.C.43. With the reconfiguration of Level B2, the proposed project would provide a total of 188 parking spaces and result in an unmet parking demand of 292 parking spaces for the proposed project.

on Stevenson Street, as discussed on EIR p. IV.C.17 and on page 25 of the Transportation Study.[9] Therefore, there would not be a significant parking or loading impact as a result of the proposed project and this change to on-street parking.

Several commentors note that given the type of value-based retail currently proposed by the project, some customers would be purchasing bulky items that would be difficult to transport any distance. Therefore, the commentors express support for the provision of parking on-site. In addition, the commentors express their belief that without the provision of on-site parking some potential customers may choose to shop elsewhere – perhaps outside the City. While this is likely true for some shoppers, other retailers of bulky items in the Downtown Core have successfully implemented options such as home delivery or the provision of a customer pick-up area with several short-term parking spaces available. Since publication of the Draft EIR, the project sponsor has reconfigured parking Level B-2 to add short-term parking spaces for the convenience of customers needing to pick up bulky item purchases. These short-term spaces also could be provided in the alternatives. In addition, the project sponsor and retail tenants may decide to provide other options such as home delivery in order to address these concerns.

As described in the Draft EIR, there would not be a significant parking impact related to the provision of two levels of parking. Nor would there be a significant parking impact for the alternatives that provide one level of parking onsite or no parking on site. However, as described in the Draft EIR, the proposed project would result in traffic impacts under both Existing Plus Project conditions as well as under 2030 Cumulative Conditions. The alternatives, which provide varying amounts of parking, would result in 2030 cumulative traffic impacts.

The *Planning Code* does not require parking to be provided as part of the proposed project. The Draft EIR provided analysis and information regarding the potential environmental impacts that would result from the inclusion of various amounts of parking. There were no significant parking impacts identified for the proposed project. Comments regarding the amount of parking to be provided by the proposed project are comments on the merits of one aspect of the project that may be considered by the decision-makers in their decision to approve, modify, or disapprove of the proposed project.

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[9] *935-965 Market Street Transportation Study – Final Report*, October 28, 2009, prepared by AECOM. This report is available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

2.6 Parking Garage Access for the Proposed Project

Comments

"Regarding: potential formation of vehicle queues on Stevenson Street that would overflow onto Sixth Street (pg IV.C.38). Has the proposed project considered making the ingress lane long enough for multiple cars to get off-street before encountering the parking ticket dispenser? (similar to The Grove's parking structure in LA) Traffic may flow quickly off-street and won't impede Stevenson/Sixth Street traffic by backing up onto Sixth Street when the cars are waiting to get the parking ticket dispensed so they may proceed and find a parking space. The 5th/Mission garage does not have a lot of leeway between the driveway and the parking ticket dispenser thus causes traffic to back up onto Mission Street and impedes the flow of traffic from 5th onto Mission. It would not be advised to repeat poor parking garage design. More than one ingress lane would also help with vehicle queues.

Regarding: Fig II.6: Proposed ground floor plan shows one driveway off of Stevenson Street with ingress and egress lanes (1 for each). Will the proposed project enforce a right-turn only for vehicles that are exiting from the parking structure onto the proposed Mitigation measure M-TR-1c? It will cause traffic congestion if vehicles exiting the garage are allowed to make left hand turns onto Stevenson Street while vehicles are attempting to enter the garage from Stevenson Street." *(Laura Kennedy, December 7, 2009) [G-2]*

Response

The commentor expressed concern with traffic queues from the proposed parking garage backing up into Stevenson Street and Sixth Street and the entry and exit lanes of the proposed parking garage as shown on Figure II.6.

As proposed, a ticket dispenser (with a service rate of approximately 250 vehicles an hour[10], or about 15 seconds per vehicle), would be located at the base of the garage ramp, which provides space for multiple vehicles to queue on the ramp instead of on Stevenson Street (see p. 51 of the Transportation Study). With the current garage designs, there would be about 150 feet of queue space along the entrance ramp (space for approximately six or seven vehicles). To determine if this storage space would be adequate to accommodate queues that may form at the ticket dispenser, two queue lengths were calculated: an average queue (50th percentile) based on a constant arrival rate of vehicles throughout the hour, and the theoretical maximum queue (95th percentile). During the peak hour of garage activity, there would be approximately 132 inbound vehicles. With a constant arrival rate, there would be one vehicle every 27 seconds; with a service rate of 15 seconds per vehicle, there would be a maximum of one vehicle at the ticket dispenser at one time. The 95th percentile queue was estimated as three times the average queue, or about three vehicles, based on a typical distribution of vehicular arrival patterns. Although

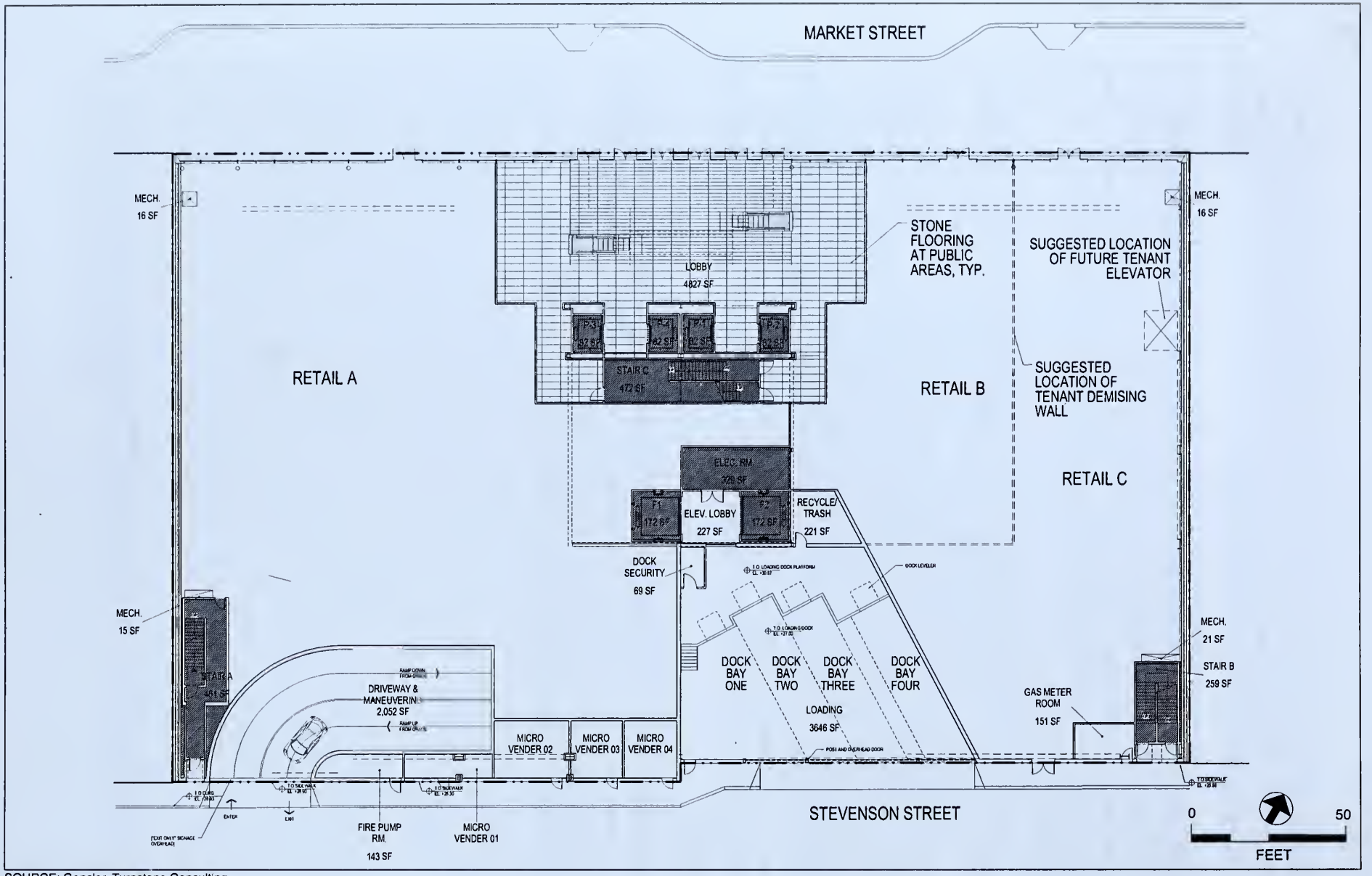
[10] Assuming the system is a push button ticket dispenser similar to the systems in place at the Union Square Garage and Fifth/Mission Garage. The value of 250 vehicles per hour was taken from Table 9.2 of *Parking*, by Weant and Levinson, 1990.

there may be times when the arrivals of vehicles surge above these levels, the flow of vehicles entering the garage would be metered by the upstream intersection of Sixth Street and Stevenson Street and therefore these occurrences would be unlikely.

Based on this assessment, the proposed single lane configuration and 150 feet of queue storage space would be expected to be adequate to accommodate the vehicles accessing the parking garage during the peak period and would not result in impacts to Stevenson Street operations. As a result, there would be no need to make this ingress lane any longer to accommodate peak demand for the parking garage.

With the proposed project, the garage driveways were configured so that the entry lane would be located to the west of the exit lane since Stevenson Street is one-way eastbound. With this layout, vehicles making a left-turn into the garage would not cross vehicles making a left-turn out of the garage. These EIR Figures, located on EIR pp. II.11, II.14, and II.17, have been revised for clarification to show the correct entry/exit sequence from one-way Stevenson Street and the correct parking space orientation at the second basement level. Please see Figure II.6: Proposed Ground Floor Plan (Revised), Figure II.8: Proposed First Basement Floor (B1) Plan (Revised), and Figure II.10: Proposed Second Basement Floor (B2) Plan (Revised) for the correct exit and entry and ramp directions/labels and the correct orientation for parking spaces at the second basement level.

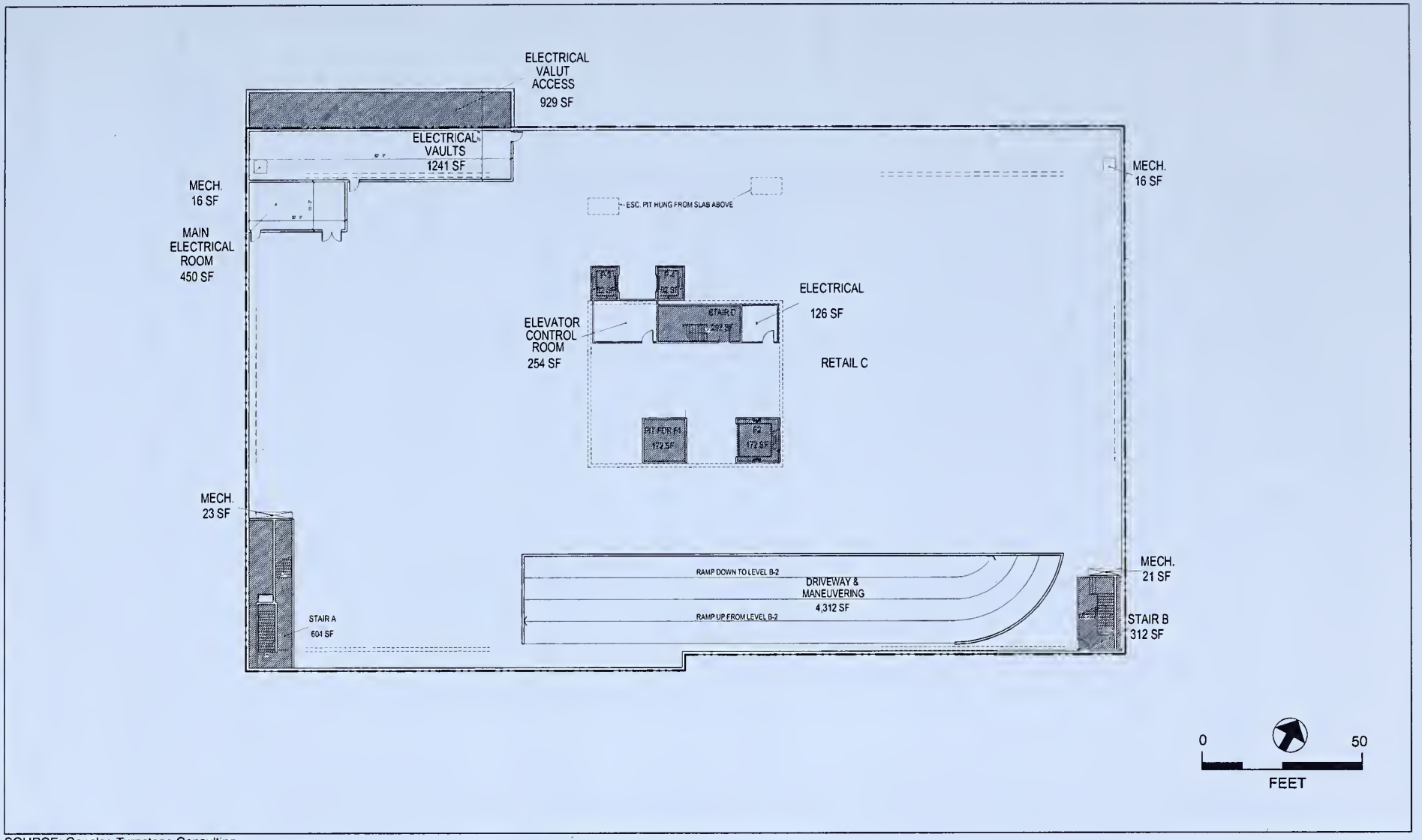
As described on Draft EIR pp. IV.C.50-IV.C.51, proposed Mitigation Measure M-TR-1c would convert Stevenson Street, west of the proposed garage driveways, to two-way operation. SFMTA has reviewed Mitigation Measure M-TR-1c and determined that it would not be feasible. Therefore, as described on Draft EIR p. IV.C.51, M-TR-1c will not be implemented.



SOURCE: Gensler, Turnstone Consulting

CITYPLACE
2005.1074E

FIGURE II.6: PROPOSED GROUND FLOOR PLAN (REVISED)

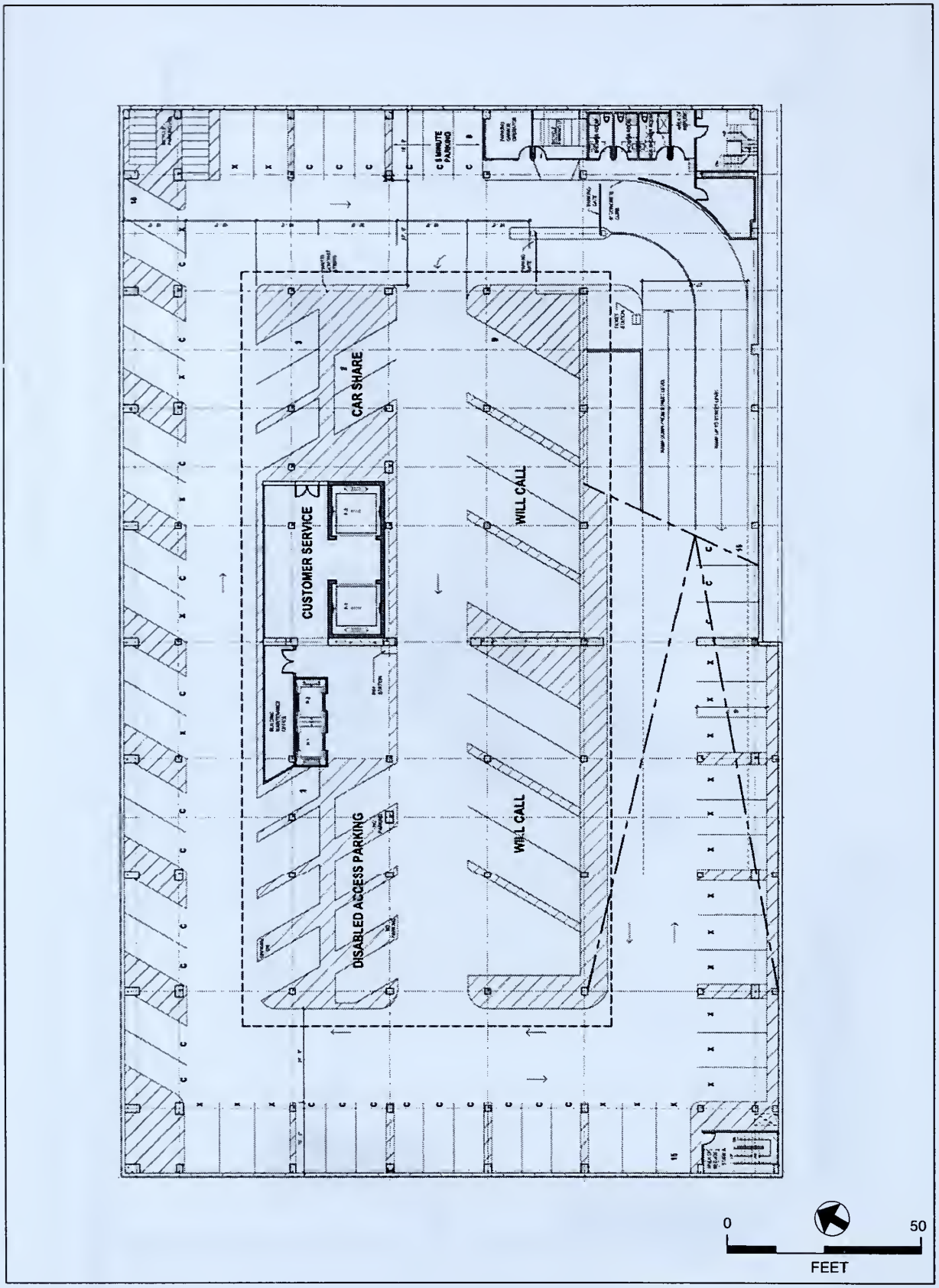


SOURCE: Gensler, Turnstone Consulting

CITYPLACE

2005.1074E

FIGURE II.8: PROPOSED FIRST BASEMENT FLOOR (B1) PLAN (REVISED)



SOURCE: Gensler, Turnstone Consulting

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FIGURE II.10: PROPOSED SECOND BASEMENT FLOOR (B2) PLAN (REVISED)

2.7 Transportation Impacts Analysis Methodology: Bicycle Impacts Analysis

Comments

"2. We dispute the DEIR's assertion that the proposed project will create 'less-than-significant impacts' on bicycle travel. Given the DEIR's estimate of 280 new auto trips at PM peak entering and exiting Stevenson Street, we believe that such additional vehicle movements would present considerable, and potentially significant, new conflicts and safety impacts to pedestrian and bicycle circulation in the project area, particularly on Fifth Street (Bike Network Route #17) and Market Street (Bike Network Route #50), both designated bicycle routes. Market Street already carries very large volumes of bicycle traffic and both streets are expected to see increases in bicycle traffic as improvements derived from the 2009 San Francisco Bicycle Plan and other plans and projects are implemented. The project sponsor is able to claim 'less-than-significant impacts' because the city has failed to provide a threshold for determining significance of impacts on bicycle travel. The modeling and analysis fails to recognize the public safety and public health effects related to vehicle and bicycle circulation and must be revised and refined for this DEIR prior to certification." *(Andy Thornley, San Francisco Bicycle Coalition, December 21, 2009) [I-2]*

Response

The commentor asserts that the bicycle impact analysis provided in the Draft EIR mischaracterizes the impact that the addition of 280 project-related PM peak auto trips would have on cyclists on Market Street and on Fifth Street. In addition, the commentor asserts that the analysis fails to recognize the public safety and public health effects related to vehicle and bicycle circulation.

The determination of potential project-related impacts on bicycling conditions was based on the criterion established by the San Francisco Planning Department's October 2002 *Transportation Impact Analysis Guidelines for Environmental Review* (*SF Guidelines*) which is identified on EIR p. IV.C.22.

During the weekday PM peak hour, it was estimated that 132 project vehicles would enter Stevenson Street from Sixth Street and 148 project vehicles would exit Stevenson Street to Fifth Street (see EIR pp. IV.C.24 and 25), for a total activity of about 280 vehicles. At the Fifth Street and Stevenson Street intersection, the eastbound Stevenson Street approach would be stop-controlled, and vehicles would need to wait for an acceptable gap in Fifth Street vehicular traffic, pedestrian flows, and bicycle flows in order to safely turn right or left. At the Fifth Street/Mission Street intersection, southbound right turning vehicles may also have the potential to conflict with bicycles on the Fifth Street bicycle lane (Route 19), but the potential for conflicts was not found to be a significant impact, as discussed on EIR pp. IV.C.36-IV.C.37.

Due to the prohibition of left-turns for the majority of Market Street in the downtown area, coupled with the generally lower speeds and mix of transit, pedestrian and bicycle activity, it is anticipated that relatively few vehicles would use a significant portion of Market Street to travel to and from the project site. As a result, the potential for conflicts with bicyclists on Market Street (Route 50) would be limited and would not be significant.

2.8 Transportation Impacts Analysis Methodology: Pedestrian Safety

Comments

"Then we turn to pedestrian issues. But even though the Project and cumulative retail development traffic impacts fall mostly upon nearby SOMA streets and intersections, the pedestrian/ traffic safety issues of those locations are totally ignored by the DEIR.

Sixth Street with its very heavy existing traffic is widely known to be a very dangerous street for pedestrians, with many reported injury accidents. And it will be the necessary access route to the Project's garage, thus adding to this existing problem. The DEIR however ignores all this despite its importance to the hundreds of residents living almost next to the proposed project in the Sixth Street Corridor!" *(John Elberling, The Yerba Buena Consortium, December 16, 2009) [F-3]*

"2. The Draft EIR does not accurately account for, or mitigate, the impact of traffic generated by the project on pedestrians.

In its pedestrian analysis, the EIR focuses exclusively on 'Pedestrian Level-of-Service,' a measure of sidewalk crowding. It analyzes Pedestrian Level-of-Service only on Market Street, which has the widest sidewalks in San Francisco. This analysis is inadequate because it does not account for the potential injury to pedestrians by auto traffic generated by the project. Few, if any, pedestrians have been killed or injured by sidewalk congestion, but many are injured by collisions with autos. Many of the most dangerous intersections in the South of Market area are located on streets directly affected by this project, namely 6th Street, which will be a primary access corridor to the project. The corners of 6th and Market, 6th and Mission, 6th and Minna, and 6th and Jessie have high levels of pedestrian collisions. This project will generate significantly more traffic on 6th, as well as 5th and possibly Market Streets. The number of cars using narrow Stevenson Street will go from virtually none today to over 140 per hour, with significantly higher volumes at peak shopping times. These additional turn movements onto and off of Stevenson will cross bicycle lanes planned for 5th Street as well as the busy (and narrow) sidewalks on 5th and 6th. Cars queuing to enter the garage, or waiting to exit onto the numbered streets, can result in blocked crosswalks and bicycle lanes.

In order to adequately address pedestrian safety, the project EIR must:

- use a pedestrian safety model, like the city's Pedestrian Injury Model, which can accurately model the impacts of additional traffic and additional turn movements on pedestrian safety.
- mitigate the impacts on pedestrians and cyclists by bringing sidewalks and crosswalks up to the City's adopted standards. The downtown Streetscape plan calls for:
    - sidewalk widths on 'base case' streets of 12-14 feet. The project should widen sidewalks on 5th and 6th Streets to the city standard.

- bulbouts at street corners. The project should provide bulbouts into 5th and 6th Streets at Market in accordance with city standards.
- additional street crossings. The additional traffic caused by the project will further endanger pedestrians crossing at the small streets parallel to Market. Crosswalks with corner bulbouts should be built at 6th and Stevenson, 6th and Jessie, and 5th and Jessie (aka Mint Plaza)" *(Tom Radulovich, Livable City, December 21, 2009) [H-2]*

"What a proper EIR would do is identify this issue, report the impact, and discuss potential mitigations. Certainly signalized mid-block pedestrian crossings someplace on the Market-Mission and Mission-Howard blocks of Sixth Street where most injury accidents occur would be on that list. An overall Sixth Street Pedestrian Safety Plan – none now exists – would also be an essential initial mitigation.

"3. Pedestrian effects are only evaluated in the DEIR on the basis of sidewalk crowding, not public safety or public health. The DEIR fails to address impacts of 280 new auto trips at PM peak, which will be crossing the pedestrian realm at both the intersections of Stevenson on 5th and 6th Street. As for comment #2 above, and given the city's many declared and adopted policy commitments for increased pedestrian activity on the streets and sidewalks in the project area, we believe that the DEIR should develop more rigorous modeling and analysis of public safety and public health effects related to vehicle and pedestrian circulation." *(Andy Thornley, San Francisco Bicycle Coalition December 21, 2009) [I-3]*

"According to the transportation section of the report, the project would add about 200 vehicle trips into the Project garage, and about 200 trips out, during the peak hour of the evening, for a total of about 400 vehicles. These would all be added on Stevenson Street, a small alley.

Meanwhile, the Project aims to remake Stevenson Street into a pedestrian-friendly 'green street'. Pedestrians would be drawn to new 'microvendors' on Stevenson Street, among other attractions. Bicycles would likely frequent the microvendors as well.

Despite putting about 400 cars per hour on this pedestrian-oriented street, the EIR found that there would be no significant impact to pedestrians. Likewise, when these 400 cars have to cross the crosswalks of 5th and 6th Streets, which have many pedestrians, there was again no finding of significant impact to pedestrian.

How do we know that this volume of cars crossing will not cause a significant impact to pedestrians? Given the especially vulnerable pedestrians who live in this area, it appears that vehicle/pedestrian collisions would increase.

The Final EIR should include the finding of significant pedestrian impacts resulting from high numbers of vehicles on Stevenson Street and crossing the crosswalks along 5th and 6th Street." *(John Fordham, December 21, 2009) [J-1]*

Response

The commentors assert that the pedestrian analysis conducted for the Draft EIR was inadequate and focused on pedestrian level of service with inadequate discussion of pedestrian safety. In addition, the commentors state that mitigation measures should be incorporated for pedestrian impacts of the proposed project.

Pursuant to the *SF Guidelines,* pedestrian conditions and a project's potential impact may be discussed quantitatively or qualitatively depending upon the project size and existing circumstances. Furthermore, pedestrian safety issues related to a project should be assessed. This assessment should identify and examine potential conflicts between pedestrian movements at driveways, localized pedestrian hazards and, more generally, between pedestrians and vehicles. The significance criteria regarding pedestrian impacts are identified on EIR p. IV.C.22. A project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potential hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.

Pedestrian impacts for the proposed project are discussed on EIR pp. IV.C.33-IV.C.36 and EIR p. IV.C.43. The discussion in the EIR notes that the heaviest pedestrian loads would occur at the Fifth Street/Mission Street intersections and along the Market Street corridor. It is likely that substantially fewer pedestrians would be expected to approach the project site on Sixth Street because most parking garages are east or north of the project site and there are more transit stops at the intersection of Mission and Fifth Streets than at the intersection of Mission and Sixth Streets. Transit riders using lines on Market Street, or north of Market Street, would not likely use Sixth Street to enter stores at the project site.

A quantitative analysis was conducted with respect to pedestrian level of service for Market Street and is presented in the EIR, pp. IV.C.33-34. In addition, a qualitative analysis was conducted for Fifth and Mission Streets and is presented in the EIR, pp. IV.C.34-35. No significant pedestrian impacts were identified, as the sidewalks and crosswalks can accommodate the increases due to the proposed project. In addition, a supplemental quantitative pedestrian impact analysis was conducted for Fifth and Mission Streets in response to these comments to supplement the qualitative analysis provided in the EIR. The supplemental quantitative pedestrian analysis is part of the *Supplemental Transportation Analysis.* The results are presented at the end of this response and in Section D. Draft EIR Text Changes; no significant pedestrian impacts were identified.

The proposed project would not interfere with pedestrian accessibility to the site and adjoining areas. No changes to the street network are proposed as a result of the project. In addition, the project would include the implementation of a greening project along Stevenson Street as described on EIR p. IV.C.35. Although the implementation of the greening improvements may increase pedestrian volumes along the north side of Stevenson Street, overall the effect would be to improve the pedestrian character of the street with the inclusion of a mini plaza, street trees, planters, and public art. The greening project is also intended to increase pedestrian safety by creating a greater awareness of pedestrians and calming traffic along Stevenson Street.

As previously stated, analysis regarding potential pedestrian impacts may be qualitative instead of quantitative and be considered adequate. With respect to pedestrian safety, the EIR describes the nature of potential conflicts between vehicles and pedestrians as well as the locations likely to experience the greatest increase in these conflicts. The greatest increase in potential pedestrian-vehicle conflicts due to the proposed project would occur at the intersections of Sixth and Stevenson Streets and at Fifth and Stevenson Streets. These are discussed in the EIR on pp. IV.C.35-36. The analysis provided by the Transportation Study and the *Supplemental Transportation Analysis* concludes that the pedestrian facilities in the project vicinity would be adequate for the anticipated trips generated by the proposed project. In addition, Mitigation Measure M-TR-2 proposes a loading management system to limit the presence of trucks turning onto and off of Stevenson Street during daytime and early evening hours that would reduce the potential conflicts between pedestrians and trucks to less than significant. Lastly, it may be pointed out that pedestrian safety could increase along Fifth Street due to "safety in numbers" conditions – greater pedestrian presence would cause drivers to expect and adapt to increased interactions with pedestrians at this location.

San Francisco as a whole has a substantially greater number of pedestrian injury accidents on a population-weighted basis than the national average, largely because there is much more pedestrian activity than most comparably-sized cities. The average rate of pedestrian injuries and fatalities in California as a whole is 40 per 100,000 based on 2005 data from the California Highway Patrol. In part, the city's pedestrian injury rate of 104 per 100,000 residents reflects a higher level of pedestrian activity than most comparably-sized cities; however, the San Francisco Department of Public Health (DPH) findings and other research indicate that this explains only a part of the difference. Based on the published findings of Jacobsen (2003), who analyzed data from 68 California cities, the effect of pedestrian activity in San Francisco on the relative pedestrian injury rate can be estimated by the relationship that the number of pedestrian collisions increases at approximately 0.4 power of the number of people walking to work.[11] Using this empirically-derived relationship and publicly-available data from the U.S. Census on the proportion of workers walking to work in the United States (2.9 percent) and in San Francisco (9.4 percent), we would expect San Francisco to have about 1.6 times more pedestrian collisions than comparable cities (i.e., $(9.4/2.9)^{0.4}$=160 percent). This adjustment also shows that while 60 percent more collisions per resident (a rate of 64 per 100,000) may be expected based on greater pedestrian activity, the degree of pedestrian activity does not fully account for the high rate of collisions in parts of the City. San Francisco's relatively high rate of collisions may also

[11] Jacobsen, Peter Lyndon. "Safety in numbers: more walkers and bicyclists, safer walking and bicycling". *Injury Prevention*, 2003, 9:205-209. This relationship between injuries and the proportion walking to work can be summarized with the following equation: % change in injury = (% change in walking)$^{0.4}$.

be influenced by the increased exposure associated with a 50 percent increase in its daytime population relative to its resident population due to an influx of commuters into its job centers.

DPH analyzes pedestrian injuries due to traffic accidents from a public health perspective and has developed a Vehicle-Pedestrian Injury Collision Model[12] as discussed below. DPH notes that traffic accidents in general are a leading cause of death and injury in the United States. Beyond direct injuries and deaths, as matter of public health, DPH states that increased pedestrian safety can encourage walking, which in turn can have direct health benefits such as reducing obesity and indirect benefits such as improved air quality resulting from lesser traffic volumes.

The DPH Vehicle-Pedestrian Injury Collision Model is one approach to evaluating pedestrian hazards, and is intended to compliment more traditional methods of pedestrian hazards analysis. The DPH model employs a health risk assessment analytic approach to the presentation of existing area-wide conditions and the forecasting of area-wide trends that focuses on area-level factors such as traffic volumes and population. It differs from the traditional traffic engineering or hot spot approach to accident analysis, which is focused more closely on specific locations; that is, traffic engineers tend to examine specific locations (generally, intersections) where a relatively large number of accidents are noted and to examine potential operational solutions (e.g., installation of new traffic signals, signal re-timing, sidewalk widening such as bulbouts, and the like) in an effort to alleviate site-specific traffic hazards. The traditional approach also goes beyond a simple compilation of accident volumes to include a detailed examination of the causes of accidents at specific locations.

The number of collisions involving pedestrians at an intersection is a function of the traffic volume, travel speed, intersection configuration, traffic control, surrounding land uses, location, and number of pedestrians. The proposed project would not change the surrounding street network with the exception of greening improvements on Stevenson Street as described above. These would improve pedestrian conditions and would serve as traffic calming measures which would partially offset impacts due to the increased traffic on Stevenson Street. In addition, Mitigation Measure M-TR-2 to have a loading management system to monitor and restrict truck traffic on Stevenson Street would limit pedestrian-vehicle conflicts. Furthermore, improvement measures to add signage, mirrors for the parking garage entrance, and pedestrian warning systems for pedestrians for the garage and loading dock would be expected to improve pedestrian safety on Stevenson Street in the vicinity of the project site (see Improvement Measures I-TR-G, I-TR-H, and I-TR-I on EIR p. IV.C.55).

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[12] More information regarding the San Francisco Department of Public Health Vehicle-Pedestrian Injury Collision model is available online at http://www.sfphes.org/HIA_Tools_Ped_Injury_Model.htm. Accessed May 4, 2010.

Overall, the existing pedestrian facilities would be adequate to meet the pedestrian demand associated with the proposed project land uses, and the project impacts on pedestrian circulation within and in the vicinity of the project site would be less than significant. No element of the proposed project would increase pedestrian hazards such that there would be a pedestrian safety hazard. Therefore, the EIR properly concluded that there would be no significant impacts to pedestrians as a result of the proposed project. As no significant pedestrian impacts have been identified, there is no requirement for mitigation measures related to pedestrian impacts as described by the commentors.

Each year the San Francisco Municipal Transportation Agency (SFMTA) develops a Collisions Report. The purpose of the report is to identify long-term collision trends and intersections with the highest collision totals. From this information SFMTA may focus mitigation efforts and evaluate the effectiveness of mitigation measures already implemented to address safety. The report notes that the list of highest collisions is not a listing of the "most dangerous" intersections. Short-term annual increases at a particular intersection can be the result of random variation. However, it is true that busier intersections with more pedestrians and a greater volume of vehicular traffic may be the site of a greater number of collisions than other less busy locations.

For the three-year period between 2006 and 2008, the four highest injury vehicle-pedestrian collision locations were located in a four-block stretch along the Sixth Street and Golden Gate Avenue corridors. The Sixth Street/Market Street intersection is one of the locations. Despite pedestrian improvements such as the installation of pedestrian countdown signals (2003) by SFMTA, the number of vehicle-pedestrian collision totals increased in comparison to the previous three-year period between 2003 and 2005.[13] No single pattern for the collisions at this intersection has yet been identified making specific collision reduction measures difficult to identify. Recent improvements by SFMTA at this intersection have included repainting the crosswalks (2009); modification of pedestrian signals for greater visibility (2009); and the installation of "No Turn on Red" signage at all approaches (2009). In general, the number of pedestrian injury collisions citywide (including fatalities) has declined between 1999 and 2008, from 915 in 1999 to 799 in 2008.[14]

The SFMTA Collisions Report identifies Sixth Street between Howard and Market Streets continuing to Golden Gate Avenue and Jones Street as a corridor experiencing a greater number of collisions, in particular pedestrian-vehicle collisions. While no pattern is discernable for the incidents at Sixth and Market Streets, the trend at Sixth and Howard Streets is collisions with pedestrians resulting from turning vehicles. However, as previously described, most of the

[13] Department of Parking and Traffic, *San Francisco 2008 Collisions Report,* December 19, 2009; Table 14, p. 34.
[14] Ibid, p. 32.

pedestrian trips attributable to the proposed project would be on Fifth Street not on Sixth Street. Also, with respect to vehicular traffic during the weekday PM peak hour, 132 vehicles are expected to enter Stevenson Street from Sixth Street, and 148 are expecting to exit Stevenson Street onto Fifth Street, for a total of 280 additional vehicles on Stevenson Street during the weekday PM peak hour, as presented on EIR pp. IV.C.24-IV.C.25. This volume of vehicular traffic would not be considered substantial in the context of the Downtown core. While a majority of the pedestrian trips attributable to the proposed project would be on Fifth Street, and not on Sixth Street, some increase in pedestrian activity on Sixth Street as a result of the proposed project could result in increased pedestrian safety due to "safety in numbers" conditions – greater pedestrian presence would cause drivers to expect and adapt to increased interactions with pedestrians.

A supplemental quantitative pedestrian analysis was conducted in response to these comments to quantify the analysis for Fifth Street which had been presented qualitatively in the Draft EIR.[15] The supplemental quantitative pedestrian analysis was conducted for the four crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. The analysis was conducted for the proposed project, the No Garage Alternative, and the Reduced Parking Variant. As described, the Reduced Parking Variant would consist of the same size retail project as the proposed project with one level of parking instead of two levels and would provide approximately 80 parking spaces. The Reduced Parking Variant was added to the analysis in order to understand what potential impacts would result from a range in the amount of parking between including two levels of parking as provided by the proposed project and none as provided by the No Garage Alternative. Please see Section D. Draft EIR Text Changes for Chapter VI, Alternatives, for a description of this variant and its potential environmental impacts.

Proposed Project

Although parking would be provided on site, the portion of proposed project vehicles that cannot be accommodated within the on-site parking garage would be expected to park at nearby off-site parking facilities, including the Fifth/Mission Garage, the Ellis/O'Farrell Garage, and the Union Square Garage. The additional pedestrian traffic between the project site and the Fifth/Mission Garage would likely increase the number of pedestrians crossing the Fifth Street/Mission Street intersection and adjacent pedestrian facilities. It is estimated that the proposed project would contribute approximately 173 auto pedestrian trips (pedestrians walking between the

[15] AECOM, May 5, 2010. Technical Memorandum *CityPlace Transportation Study – Results of Supplemental Traffic and Pedestrian Analysis.* This technical memorandum is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

Fifth/Mission Garage and the project site) to the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk analysis location during the weekday PM peak hour.

No Garage Alternative

The reassignment of project vehicles to the nearby Fifth/Mission Garage (75 percent of all vehicle-trips) would result in approximately 350 auto pedestrian trips to the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk during the weekday PM peak hour, which is about twice as many as the proposed project. The additional pedestrian and vehicular traffic between the project site and the Fifth/Mission Garage would create more congested pedestrian conditions compared to the proposed project, especially at the crosswalks and the channelized northbound right-turn movement from Fifth Street to Mission Street.

Reduced Parking Variant of the No Garage Alternative

With the same size building and about half of the parking supply as the proposed project, a larger portion of project vehicles would not be accommodated within the on-site parking garage and would be expected to park at nearby off-site parking facilities, including the Fifth/Mission, the Ellis/O'Farrell, and the Union Square Garages. The additional pedestrian traffic between the project site and the Fifth/Mission Garage would likely increase the number of pedestrians crossing the Fifth Street/Mission Street intersection and adjacent pedestrian facilities. It is estimated that the Reduced Parking Variant would contribute approximately 275 auto pedestrian trips to the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk analysis location during the weekday PM peak hour. The additional pedestrian and vehicular traffic between the project site and the Fifth/Mission Garage would create more congested pedestrian conditions compared to the proposed project, but less congestion compared to the No Garage Alternative. A summary of pedestrian volumes expected to travel through the vicinity of the Fifth Street/Mission Street intersection and other areas (i.e., Market Street corridor) is shown in Table C&R.7.

Table C&R.7: Pedestrian Volumes

Scenario	Fifth Street/Mission Street Area				Other Areas (i.e. Market Street)				to/from Project Garage	Total
	Auto[a]	Walk[b]	Transit[c]	**Total**	Auto[a]	Walk[b]	Transit[c]	**Total**	Auto	
Proposed Project	173	94	29	**296**	79	844	263	**1186**	**238**	**1720**
No Garage Alternative	350	94	29	**473**	140	844	263	**1247**	**0**	**1720**
Reduced Parking Variant	275	94	29	**398**	113	844	263	**1220**	**102**	**1720**

Notes:
[a] Pedestrians walking from car to project site.
[b] Pedestrians walking from/to project site from their point of origin.
[c] Pedestrians walking from transit to project site.
Source: AECOM, May 2010

Crosswalk Level of Service

To evaluate the pedestrian conditions on the crosswalks at the Fifth Street/Mission Street intersection, a crosswalk LOS was calculated at each of the Fifth Street/Mission Street crossing locations using the *Institute of Transportation Engineers 2000 Highway Capacity Manual (HCM)* methodology for crosswalk analysis. Pedestrian traffic was distributed between the crosswalks as follows: 50 percent of pedestrians destined for the project site were assumed to use the east crosswalk, 25 percent of pedestrians were expected to use the south and west crosswalks, and 25 percent of pedestrians were expected to use the mid-block crosswalk between Fifth Street and Fourth Street. Most of the pedestrians that used the east crosswalk would likely continue north on the east side of Fifth Street and cross at the Fifth Street/Market Street intersection. However, about 20 percent of the pedestrians in the east crosswalk were assumed to use the north crosswalk to get to and from the site. The results of this analysis are presented in Tables C&R.8 and C&R.9, and, as shown, all crosswalks at the Fifth Street/Mission Street intersection operate at acceptable LOS (LOS D or better) under all scenarios. All four crosswalks at the Fifth Street/Mission Street intersection operate at acceptable LOS A under Existing Conditions.

All four crosswalks would be expected to continue to operate at acceptable levels (LOS C or better) under the proposed project, the No Garage Alternative, and the Reduced Parking Variant. The heaviest pedestrian traffic occurring under the project options would occur in the east and west crosswalks, crossing Mission Street. While some queuing is expected at all crossing locations, there is generally sufficient space at the corners to accommodate pedestrians waiting at the curb. The additional pedestrian traffic between the project site and the Fifth/Mission Garage could result in crowding at the corners during peak hours. Additional crowding at the southeast corner and existing pork-chop island could potentially reduce the vehicular capacity of the

Table C&R.8: Pedestrian Volumes on Mission Street Crosswalks

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B
No Garage Alternative	957	26.8	C	566	38.1	C
Reduced Parking Variant	919	28.2	C	548	39.3	C

Source: AECOM, May 2010

Table C&R.9: Pedestrian Volumes on Fifth Street Crosswalks

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B
No Garage Alternative	402	77.8	A	513	49.5	B
Reduced Parking Variant	395	80.0	A	495	51.3	B

Source: AECOM, May 2010

channelized northbound right turn lane at the Fifth Street/Mission Street intersection and may also create safety issues during peak periods. However, each of the project options would maintain adequate service levels at all crosswalks, and therefore would not result in any significant adverse impacts related to pedestrian activity.

Sidewalk Level of Service

To evaluate the pedestrian conditions on the sidewalk between the Fifth Street/Mission Street and Fifth Street/Stevenson Street intersections, a sidewalk LOS was calculated using HCM methodology. The sidewalk LOS is determined by taking the effective walkway width at a typical section of sidewalk and identifying the space per pedestrian. On this street segment, the typical section of the sidewalk on the project side of the street has an effective walkway width[16] of 11 feet. The sidewalk LOS results for Existing Conditions, Existing Plus Proposed Project, Existing Plus No Garage Alternative, and Existing Plus Reduced Parking Variant are summarized in Table C&R.10. As shown, the sidewalk on the west side of Fifth Street currently operates at

[16] Effective walkway width, as defined in the Highway Capacity Manual, is the portion of a walkway that can be used effectively by pedestrians. Effective walkway width is the total walkway width less the sum of widths and shy distances from obstructions on the walkway.

Table C&R.10: Pedestrian Volumes on Fifth Street Sidewalk

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D
No Garage Alternative	676	16.27	D
Reduced Parking Variant	649	16.9	D

Source: AECOM, May 2010

LOS D at the typical section. Under the proposed project, the No Garage Alternative, and the Reduced Parking Variant the typical section would continue to operate at LOS D.

With an increase in the number of vehicles and the volume of pedestrians, the potential for conflicts between pedestrians and vehicular traffic would increase. However, as previously described, there are adequate facilities to accommodate pedestrian volumes in the project vicinity. As a result, the potential for project-related impacts to pedestrian conditions would be minimal.

The proposed project was not considered to have a significant pedestrian impact on the Fifth Street sidewalk, based on the analysis presented here. Substantially fewer pedestrians would be expected to approach the project site from Sixth Street, because most parking garages are east or north of the project site and there are more transit stops on Mission Street at Fifth Street than at Sixth Street. Transit riders using lines on Market Street, or north of Market Street, would not use Sixth Street to enter stores. Therefore, as no significant pedestrian impacts have been identified no mitigation measures such as widening the Fifth Street sidewalks or including bulb-outs at the corners of Fifth Street/Mission Street would be necessary for the proposed project.

One commentor suggests the installation of a midblock traffic signal or signals on Sixth Street as a mitigation measure. No significant impacts were identified on Sixth Street for which a mid-block crosswalk would be identified as mitigation. Therefore, no such mitigation measures would be required. See also Response 2.10 - Transportation Mitigation Measures.

The commentor presents an incorrect number of project-generated vehicles. During the weekday PM peak hour, 132 vehicles are expected to enter Stevenson Street from Sixth Street, and 148 are expecting to exit Stevenson Street onto Fifth Street, for a total of an additional 280 vehicles on Stevenson Street during the weekday PM peak hour, as presented on EIR pp. IV.C.24-IV.C.25.

Draft EIR Text Changes

Text changes made to the Draft EIR to include pedestrian information from the *Supplemental Transportation Analysis* are shown below and in Section D, Draft EIR Text Changes for Chapter IV, Environmental Setting and Impacts, and Chapter VI, Alternatives, of the Draft EIR.

Revisions or additions to EIR text are shown as indented text. New or revised text is underlined; deleted material is shown as ~~strikethrough~~ text.

Section IV.C, Transportation and Circulation

Text is added to the end of the second full paragraph on EIR p. IV.C.14 to add information regarding the methodology used for the supplemental quantitative pedestrian analysis included in the *Supplemental Transportation Analysis*.

> In addition, pedestrian counts also were conducted in January 2010 for the supplemental quantitative pedestrian impact analysis.

The second full paragraph on EIR p. IV.C.34 is revised and separated into two paragraphs to reflect the results of the supplemental quantitative pedestrian analysis for the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk. New text with the results of the supplemental quantitative pedestrian analysis is also added after the revised paragraph(s).

> Project-related pedestrian traffic between the project site and the Fifth/Mission Garage would likely increase the number of pedestrians crossing the Fifth Street/Mission Street intersection and adjacent pedestrian facilities. The increased pedestrian volumes at the Fifth Street/Mission Street intersection resulting from project-related parking at the Fifth/Mission Garage would add to the already high volume of people crossing the channelized northbound right turn lane. Because vehicles traveling northbound on Fifth Street yield to pedestrians on the eastbound right turn to Mission Street, a small number of pedestrian/vehicle conflicts were observed at this location under existing conditions. The increased number of project-generated pedestrians queuing at this intersection would result in crowding during peak periods.
>
> The supplemental pedestrian analysis includes the four crosswalks at the Fifth Street/Mission Street intersection, and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. There would be 173 pedestrian trips assigned to the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk during the weekday PM peak hour. The pedestrian and vehicular traffic between the project site and the Fifth/Mission Garage would create more congested pedestrian conditions, especially at the crosswalks and the channelized northbound right-turn movement at the Fifth Street/Mission Street intersection. However, Ppedestrian/vehicle conflicts would not increase, as cars tend to yield when large numbers of pedestrians move through an intersection. The effect of increased pedestrian volumes crossing the channelized turn lane, therefore, would be a potential reduction to the vehicular capacity of the northbound right-turn movement. The increased use of the Fifth/Mission gGarage would also add to the volume of people crossing the Mission Street mid-block crosswalk, located between Fourth and Fifth Streets at the garage's mid-block pedestrian entry. However, the project-related increase in pedestrian volumes at this location could be accommodated within the existing free-flow operations. The results of the supplemental quantitative pedestrian analysis are provided below. ~~As a result, the project-generated pedestrians that would travel across the Fifth~~

~~Street/Mission Street intersection or the Mission Street mid-block crossing would not adversely affect existing pedestrian conditions.~~

Crosswalk Level of Service

To evaluate the pedestrian conditions on the crosswalks at the Fifth Street/Mission Street intersection, a crosswalk LOS was calculated at each of the crossing locations using the Highway Capacity Manual (HCM) methodology. Pedestrian traffic was distributed between the crosswalks as follows: 50 percent of pedestrians destined for the project site were assumed to use the east crosswalk, 25 percent of pedestrians were expected to use the south crosswalk, and 25 percent of pedestrians were expected to use the midblock crosswalk on Mission Street between Fifth Street and Fourth Street. The pedestrians that used the east crosswalk would likely continue north on the east side of Fifth Street. However, about 20 percent of the pedestrians in the east crosswalk were assumed to use the north crosswalk to get to and from the site.

As shown in new Tables IV.C.7a and IV.C.7b, all crosswalks at the Fifth Street/Mission Street intersection operate at acceptable LOS (LOS C or better) under existing conditions. All four crosswalks at the Fifth Street/Mission Street intersection would be expected to continue to operate at acceptable levels (LOS C or better) under the Existing Plus Project Conditions.

Table IV.C.7a: Pedestrian Volumes on Mission Street Crosswalks (New)

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B

Source: AECOM, May 2010

Table IV.C.7b: Pedestrian Volumes on Fifth Street Crosswalks (New)

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B

Source: AECOM, May 2010

The heaviest pedestrian traffic occurring under the proposed project would occur in the east and west crosswalks crossing Mission Street. While some queuing is expected at all crossing locations, there is generally sufficient space at the corners to accommodate pedestrians waiting at the curb. The additional pedestrian traffic between the project site and the Fifth/Mission Garage could result in crowding at the corners during peak hours. Additional crowding at the southeast corner and existing pork-chop island could potentially reduce the vehicular capacity of the channelized northbound right turn lane at the Fifth Street/Mission Street intersection and may also create safety issues during peak

periods. However, under the Existing Plus Project Conditions, adequate service levels at all crosswalks would be maintained. Therefore, there would be no significant adverse impacts related to pedestrian activity at the crosswalks.

Sidewalk Level of Service

The sidewalk level of service (LOS) was calculated for the segment of the Fifth Street sidewalk between the Fifth Street/Mission Street and the Fifth Street/Stevenson Street intersections. Under the HCM methodology the sidewalk LOS is determined by taking the effective walkway width[13] at a typical section of sidewalk and identifying the space per pedestrian. This segment of the Fifth Street sidewalk has an effective walkway width of 11 feet. As shown in Table IV.C.7c, this segment currently operates at LOS D and, under the Existing Plus Project Conditions, adequate service levels at all crosswalks would be maintained. Although additional pedestrian traffic could result in more congested conditions on the Fifth Street sidewalk, the sidewalk would continue to operate at acceptable levels (LOS D). Therefore, there would be no significant adverse impacts related to pedestrian activity at the sidewalk.

Table IV.C.7c: Pedestrian Volumes on Fifth Street Sidewalk (New)

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D

Source: AECOM, May 2010

A new footnote has been added on EIR p. IV.C.34 to reference the definition of effective walkway width. Footnote numbers in Section IV.C have been revised to account for the insertion.

[13] Effective walkway width, as defined in the Highway Capacity Manual, is the portion of a walkway that can be used effectively by pedestrians. Effective walkway width is the total walkway width less the sum of widths and shy distances from obstructions on the walkway.

Chapter VI, Alternatives

Text is added after the first paragraph on EIR p. VI.13 to present the results of the supplemental quantitative pedestrian analysis of the No Garage Alternative.

During the weekday PM peak hour 173 project-related pedestrians would travel through the four crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. The crosswalk and sidewalk level of service evaluation for these locations are presented below.

Crosswalk Level of Service

To evaluate the pedestrian conditions on the crosswalks at the Fifth Street/Mission Street intersection, a crosswalk LOS was calculated at each of the

crossing locations using the Highway Capacity Manual (HCM) methodology. Pedestrian traffic was distributed between the crosswalks as follows: 50 percent of pedestrians destined for the project site were assumed to use the east crosswalk, 25 percent of pedestrians were expected to use the south crosswalk, and 25 percent of pedestrians were expected to use the midblock crosswalk on Mission Street between Fifth Street and Fourth Street. The pedestrians that used the east crosswalk would likely continue north on the east side of Fifth Street. However, about 20 percent of the pedestrians in the east crosswalk were assumed to use the north crosswalk to get to and from the site.

As shown in new Tables VI.3a and VI.3b, all crosswalks at the Fifth Street/Mission Street intersection operate at acceptable LOS (LOS C or better) under existing conditions. All four crosswalks at the Fifth Street/Mission Street intersection would be expected to continue to operate at acceptable levels (LOS C or better) under the No Garage Alternative similar to the proposed project.

The heaviest pedestrian traffic occurring under the No Garage Alternative would occur in the east and west crosswalks, crossing Mission Street. While some queuing is expected at all crossing locations, there is generally sufficient space at the corners to accommodate pedestrians waiting at the curb. The additional pedestrian traffic between the project site and the Fifth/Mission Garage could result in crowding at the corners during peak hours. Additional crowding at the southeast corner and existing pork-chop island could potentially reduce the vehicular capacity of the channelized northbound right turn lane at the Fifth Street/Mission Street intersection and may also create safety issues during peak periods. However, under the No Garage Alternative scenario, adequate service levels at all crosswalks would be maintained. Therefore, there would be no significant adverse impacts related to pedestrian activity at the crosswalks similar to the proposed project.

Table VI.3a: Pedestrian Volumes on Mission Street Crosswalks – No Garage Alternative (New)

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B
No Garage Alternative	957	26.8	C	566	38.1	C

Source: AECOM, May 2010

Table VI.3b: Pedestrian Volumes on Fifth Street Crosswalks – No Garage Alternative (New)

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B
No Garage Alternative	402	77.8	A	513	49.5	B

Source: AECOM, May 2010

Sidewalk Level of Service

The sidewalk level of service (LOS) was calculated for the segment of the Fifth Street sidewalk between the Fifth Street/Mission Street and the Fifth Street/Stevenson Street intersections. Under the HCM methodology the sidewalk LOS is determined by taking the effective walkway width[17] at a typical section of sidewalk and identifying the space per pedestrian. This segment of the Fifth Street sidewalk has an effective walkway width of 11 feet. As shown in Table VI.3c, this segment operates at LOS D under existing conditions scenario and adequate service levels at all crosswalks would be maintained under the Existing Plus Project Conditions scenario and the No Garage Alternative. Although additional pedestrian traffic could result in more congested conditions on the Fifth Street sidewalk, the sidewalk would continue to operate at acceptable levels (LOS D). Therefore, there would be no significant adverse impacts related to pedestrian activity at the sidewalk.

Table VI.3c: Pedestrian Volumes on Fifth Street Sidewalk – No Garage Alternative (New)

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D
No Garage Alternative	676	16.27	D

Source: AECOM, May 2010

[17] Effective walkway width, as defined in the Highway Capacity Manual, is the portion of a walkway that can be used effectively by pedestrians. Effective walkway width is the total walkway width less the sum of widths and shy distances from obstructions on the walkway.

Text describing the results of the supplemental quantitative pedestrian analysis for the Reduced Parking Variant is added after the last paragraph on EIR p. VI.17. All new text is shown as underlined text.

Pedestrian Impacts

Under this variant, the reassignment of vehicles to the nearby garages would result in more pedestrian trips to the project site than that under the proposed project; however, the increase in the number of additional pedestrians on the sidewalks and crosswalks in the project area during the weekday PM peak hour parking demand would be less than the 850 additional pedestrians estimated under the No Garage Alternative. Overall, the Reduced Parking Variant would augment the 1,034 pedestrian and transit trips that would travel to and from the project site during the weekday PM peak hour under the proposed project with additional pedestrian trips from patrons who park at nearby garages and walk to the project site.

Since project vehicles were similarly reassigned, like the No Garage Alternative, the Reduced Parking Variant would have a minimal effect on pedestrian conditions in the Union Square area and the largest increases in pedestrian traffic would occur at the Fifth Street/Mission Street intersection.

During the weekday PM peak hour 275 project-related pedestrians would travel through the four crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets, 75 fewer pedestrians than under the No Garage Alternative. Pedestrian conditions at the crosswalks under this variant would be similar to those under the No Garage Alternative, i.e., the heaviest pedestrian traffic would occur in the east and west crosswalks crossing Mission Street. As shown in Tables VI.7 and VI.8, all crosswalks at the Fifth Street/Mission Street intersection would operate at acceptable LOS (LOS C or better) under existing conditions plus project, under the No Garage Alternative, and under the Reduced Parking Variant of the No Garage Alternative. As with the No Garage Alternative scenario, adequate service levels at all crosswalks would be maintained and there would be no significant adverse impacts related to pedestrian activity at the crosswalks.

Table VI.7: Pedestrian Volumes on Mission Street Crosswalks – Reduced Parking Variant of the No Garage Alternative (New)

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B
No Garage Alternative	957	26.8	C	566	38.1	C
Reduced Parking Variant	919	28.2	C	548	39.3	C

Source: AECOM, May 2010

Table VI.8: Pedestrian Volumes on Fifth Street Crosswalks – Reduced Parking Variant of the No Garage Alternative (New)

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B
No Garage Alternative	402	77.8	A	513	49.5	B
Reduced Parking Variant	395	80.0	A	495	51.3	B

Source: AECOM, May 2010

Similar to the No Garage Alternative, pedestrian conditions on the Fifth Street sidewalk segment would become more congested under this variant. As shown in Table VI.9, this segment operates at LOS D under existing conditions scenario and adequate service levels at all crosswalks would be maintained under the Existing Plus Project Conditions scenario, the No Garage Alternative, and its Reduced Parking Variant. Therefore, as with the No Garage Alternative, there would be no significant adverse impacts related to pedestrian activity at the sidewalk.

Table VI.9: Pedestrian Volumes on Fifth Street Sidewalk – Reduced Parking Variant of the No Garage Alternative (New)

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D
No Garage Alternative	676	16.27	D
Reduced Parking Variant	649	16.9	D

Source: AECOM, May 2010

2.9 Loading Impacts

Comments

"Our concerns have been mainly with our right to continue to receive our merchandise on Stevenson in a designated loading zone adjacent to our building. After reading the DEIR it seems these concerns have been voiced in the content of the draft. Thank you for addressing our issues." *(Joni Marie Theodorsen, Pearl Art & Craft, November 18, 2009)* [*D-1*]

"There was one point I had not seen in the original rough draft, or that is new in the DEIR, which says in IV.C.37:

> 'two spaces about 55 feet west of the project site would be reconfigured as a loading zone to replace the loading area proposed to be removed across from 969 Market Street (on Stevenson) to provide adequate space for an eastbound vehicle to enter the project parking garage', etc

The above proposed idea might now be a moot point, but this would be a compromise we could work with if it comes up again.

I would like to reiterate, that we support the plan as long as we can continue to legally receive trucks at the curb on Stevenson either where our yellow zone is currently located or to the west 55 feet from the project as stated above. Also, we could compromise our shipping and receiving hours from our current time of 10:00 to 5:00 pm to 9:00 till 12 noon. Anything coming after noon could be received on Market Street or in conjunction with the City Place's loading dock (assuming we would have use of their forklift). Our priority is to maintain clearly written loading hours and to avoid a verbal agreement or assurance regarding our loading practices. We welcome the change to our neighborhood." *(Joni Marie Theodorsen, Pearl Art & Craft, November 18, 2009)* [D-*2*]

Response

The commentor acknowledges that their concerns regarding potential impacts to their loading operations have been described in the Draft EIR and reiterates support for the proposed project as long as consideration is given to their loading practices. The on-street loading zones on Market Street, Stevenson Street, and Sixth Street that are used by adjacent retail establishments are described on EIR pp. IV.C.19-IV.C.20. Currently, there are two on-street loading spaces (yellow spaces) on the south curb of Stevenson Street, located approximately 250 feet east of Sixth Street, one of which is used regularly by Pearl Art & Craft (969 Market Street).[18] To provide adequate space for vehicles to safely enter the proposed parking garage, it is proposed that these spaces be relocated about 55 feet west on Stevenson Street, and the existing zone be designated a no parking (red) zone (see EIR pp. IV.C.37, IV.C.39, and IV.C.42). Although these relocated spaces would require slightly longer distances for deliveries to the adjacent 969 Market Street building, relocation would not preclude or eliminate any loading operations.

In addition, the project sponsor has agreed to implement improvement measures that could result in the development of an area-wide freight management program and the establishment of pre-specified times for use of the proposed off-street loading dock by adjacent retail establishments (see Improvement Measure I-TR-E and I-TR-F on EIR p. IV.C.55). This freight management plan would not restrict loading vehicles to other sites along Stevenson Street. The loading needs of other uses on Stevenson Street would be allowed to enter into an agreement with the project sponsor to use the proposed loading dock provided they adhere to the proposed loading dock hours of operation.

[18] The Pearl Art & Craft store closed in February 2010; however, any future tenants of the building at 969 Market Street would likely have similar loading needs and activities.

Draft EIR Text Changes

A footnote has been inserted at the end of the fifth sentence in the first paragraph on p. IV.C.42 of the Draft EIR to reflect the fact that the Pearl Art & Craft store at 969 Market Street closed in February 2010. New or revised text is underlined; deleted material is shown as ~~strikethrough~~ text. Footnote numbers in Section IV.C have been revised to account for the insertion.

> [18] The Pearl Art & Craft store closed in February 2010. However, any future tenants of the building at 969 Market Street would likely have similar loading needs and activities.

2.10 Transportation Mitigation Measures

Comments

"Although traffic would increase in the area, there seems to be feasible mitigations to deal with this." *(Carolyn Diamond, Executive Director, Market Street Association, public hearing comment, December 10, 2009) [TR/M-2]*

"This project seems to be relying on reinterpreting Stevenson Street with a traffic light. And I think the Transportation Authority needs to weigh in as to whether or not in that close a distance you even physically can install a light." (*Planning Commissioner Kathrin Moore, public hearing comments, December 10, 2009) [TR/S-1]*

"I would like to remind us about the reinterpretation of Stevenson when we talked about the plaza a couple of years ago. That was to be an active alley with historic smaller buildings on either side including active users who found an entrance door off Stevenson. This particular EIR, by re-interpreting it, does not fully really acknowledge that there was, indeed, an agreement to change. The only thing which we allowed at that time was valet parking for Westfield. We moved the door of Westfield up so it would be easier to accommodate that, and that required a left turn. We are now getting into a gray area where the two of what we heard then and are now hearing is not fully coordinated,..." (*Planning Commissioner Kathrin Moore, public hearing comments, December 10, 2009) [TR/S-2]*

"What a proper EIR would do is identify this issue, report the impact, and discuss potential mitigations. Certainly signalized mid-block pedestrian crossings someplace on the Market-Mission and Mission-Howard blocks of Sixth Street where most injury accidents occur would be on that list. An overall Sixth Street Pedestrian Safety Plan – none now exists – would also be an essential initial mitigation.

Other garage developers in the district have funded new signals / crosswalks in comparable situations (Fourth/Minna per the Fifth/Mission Garage Expansion and Third/Stevenson per the Jessie Square Garage Project) to improve both traffic flow to/ from their garages and traffic/ pedestrian safety. Why was this standard mitigation not included in this DEIR?" *(John Elberling, The Yerba Buena Consortium, December 16, 2009) [F-4]*

Response

The comments relate to mitigation measures identified for the proposed project as well as suggestions for additional mitigation measures by the commentors.

Comments TR/S-1 and TR/S-2 reference a prior project at Mint Plaza, Mint Plaza Public Improvements. The Mint Plaza project required that Nordstrom valet operators use Stevenson Street to access the valet station on the east side of Fifth Street, instead of using Mint Alley which was converted to a pedestrian plaza. Restricting left turns from Stevenson Street onto Fifth Street was proposed as Mitigation Measure M-TR-1b and would adversely impact traffic as well as Nordstrom valet operations; therefore, Mitigation Measure M-TR-1b was determined to be infeasible (see EIR pp. IV.C.49-IV.C.50). In addition, as described in the Draft EIR on pp. IV.C.49-IV.C.50, Mitigation Measure M-TR-1a, to install a mid-block traffic signal at the intersection of Fifth and Stevenson Streets, was proposed to address the significant impact at that intersection. Although geometrically feasible, SFMTA determined this mitigation measure to be inappropriate for this location, as it would result in a new mid-block traffic signal with close spacing to the Fifth Street/Market Street and Fifth Street/Mission Street signals. This could affect traffic flows and result in queues that block nearby intersections. As a result, this potential mitigation measure, Mitigation Measure M-TR-1a, was considered to be not feasible and will not be implemented.

Comment F-4 suggests the installation of midblock traffic signal or signals on Sixth Street between Market and Mission Streets and between Mission and Howard Streets as a mitigation measure(s). Mid-block crosswalks are discouraged in the downtown area due to the close spacing of major intersections. In addition, as noted above, SFMTA has concluded that a new traffic signal at the Fifth Street/Stevenson Street intersection would not be appropriate due to its close spacing to the existing traffic signals at Market Street and Mission Street. This is explained on EIR pp. IV.C.49-IV.C.50, where it is noted that SFMTA reviewed the transportation-related mitigation measures for the project and determined that a mid-block traffic signal on Fifth Street at Stevenson Street would not be feasible. No new traffic signals are proposed along Stevenson Street as a result of the proposed project. There were no significant pedestrian safety impacts identified on Sixth Street for which a mid-block crosswalk would be identified mitigation. Therefore, no such mitigation measures would be required. As a result, any previous plans and discussions for Stevenson Street would not be negatively affected by the proposed project. Please refer to Response 2.8 - Transportation Impacts Analysis Methodology: Pedestrian Safety for additional discussion regarding pedestrian safety in the project vicinity.

2.11 Better Market Street Project

Comment

"Also that because of the more recent trial, I guess you'd call it, which seems to be heading toward being more permanent, I would like to know if that is a legitimate concern with respect to the traffic and circulation study itself, referring to the changes where you're coming down Market Street and now have to divert off of whatever they are, Tenth and whatever, and what that -- what the impact of that is on this particular project." (*Planning Commissioner Hisashi Sugaya, public hearing comments, December 10, 2009) [TR/P-4]*

"Also, because of the potential permanence of traffic restrictions on Market Street, there should be any analysis of how these changes to Market Street affect the streets to the south and east, including Mission Street, Howard Street, Folsom Street and the numbered streets from Third to Eighth Streets as related to the proposed project." (*Planning Commissioner Hisashi Sugaya, December 10, 2009) [E-5]*

Response

The commentor requests information regarding the potential impact on the proposed project should the trial traffic conditions on Market Street become permanent. The trial traffic conditions referenced by the commentor are part of the Better Market Street Project.

The objective of the Better Market Street Project is to improve transit and pedestrian operations by reducing auto through traffic on Market Street. The overall program for this project has not yet been developed. At this time, preliminary pilot studies are being implemented for the purpose of research and data collection. As part of this project, the City recently initiated a transportation improvement pilot study to determine if discouraging eastbound through traffic on Market Street can improve transit and pedestrian conditions along the corridor. The pilot program primarily affects eastbound traffic traveling toward the Ferry Building. Westbound traffic on Market Street (toward Van Ness Avenue) is not affected. Transit, emergency vehicles, taxis, delivery vehicles, and bicycles continue to travel in both directions on Market Street, and all traffic on streets crossing Market Street continue as normal.

This pilot program was not in place at the time of the transportation analysis for the proposed project. Since the pilot project is not permanent, intersection level of service conditions and impact analyses were not subsequently added to the *Transportation Study* or Draft EIR analysis to assess impacts with portions of Market Street closed to some through traffic.

The restrictions on certain eastbound through movements on Market Street make private vehicle circulation along Market Street more difficult in the City's downtown area. To determine the effectiveness of the pilot program, SFMTA conducted a series of weekday AM peak hour, midday peak hour, and PM peak hour traffic counts and vehicle classification counts at key

intersections along Market Street and Mission Street before and after the program started (in September and October 2009, respectively).[19] In general, the data indicated the following trends on the streets surrounding the project site:

- Traffic volumes on Market Street between Eighth Street and Sixth Street and between Sixth Street and Fourth Street decreased by almost 30 percent and 40 percent, respectively.
- On Mission Street, through traffic volumes between Eighth Street and Sixth Street and between Sixth Street and Fourth Street increased by about 5 percent and 25 percent, respectively.
- Further east (past Fourth Street), right turn restrictions had a minimal effect on traffic volumes on Market Street and Mission Street.
- Traffic volumes on Sixth Street between Market Street and Mission Street increased by about 20 percent; changes on other north/south streets were minimal.

This pilot program was modified on January 26, 2010 to update one of the required right turn locations.[20] The program now diverts traffic traveling eastbound on Market Street by requiring eastbound traffic to turn right at Tenth Street while traffic entering eastbound Market Street between Tenth Street and Seventh Street is required to turn right onto Sixth Street. Motorists continue to have access to eastbound Market Street by turning right from northbound streets such as Ninth, Seventh, Sixth, or Fifth Streets, or by turning left from southbound streets such as Polk, Hyde or Stockton Streets. New traffic counts for this recently implemented modification are not available; however, it is anticipated that they would not substantially change conclusions based on the older counts. The effects of the turn restrictions will continue to be monitored and modified for the remainder of the pilot program, at which time a determination of the long-term plans for the program will be explored by the City. If implemented permanently, an appropriate level of environmental review and clearance would be required.

In general, it is estimated that the change in traffic volumes that are caused by the required Market Street right turns at Tenth Street and Sixth Street would not change any conclusions of the transportation analysis as documented in the Transportation Study and Draft EIR for the proposed project. Since the data collected for the pilot program indicated only a minor change in traffic volumes on Fifth Street, it is anticipated that the Existing plus Project and 2030 Cumulative impacts caused by the proposed project at the intersection of Fifth Street/Stevenson Street would remain. In addition, due to the documented increase in traffic volumes on Mission Street with the pilot program, the proposed project's significant cumulative impact at the intersection of Fifth Street/Mission Street would also remain.

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[19] The "before" counts were collected on Tuesday-Thursday, September 15-17, 2009. The "after" counts were done on Tuesday-Thursday, October 20-22, 2009. The Required Right Turn pilot project at Eighth and Sixth Streets began on Tuesday, September 29, 2009.

[20] San Francisco Planning Department, Better Market Street Project website. Online at http://marketstreet.sfplanning.org/. Accessed on May 4, 2010.

The extent of right turns at Tenth Street and Sixth Street are not anticipated to affect the results of the analysis of the proposed project's impacts on transit, parking, pedestrians, bicycles, loading, and construction. In general, full access to the project site would remain for all loading and construction vehicles, with only minor rerouting of trips required, if the pilot program remained in effect for a long period or was eventually made permanent. In addition, the reduction in traffic volumes on Market Street would improve pedestrian and bicycle circulation conditions, thereby enhancing access to the project site.

2.12 Transportation Impacts Analysis Methodology: Cumulative Parking Impacts Analysis

Comments

Moreover, the cumulative parking supply analysis failed to add potential cumulative future retail growth. This despite the current discussion of converting a substantial portion of the Metreon mall (now depressed and largely vacant) to comparable discount retail use.

The bottom line is there is a foreseeable significant retail parking shortage in coming years in this district after economic recovery. The consequence of such a shortage will be increased on-street queues and degraded levels of service at the impacted intersections at the actual peak times of Saturdays and the Holiday season. The DEIR fails to report this very important fact and policy consideration." *(John Elberling, The Yerba Buena Consortium, December 16, 2009) [F-2]*

Response

The transportation analysis includes a cumulative condition (see EIR p. IV.C.45), which considers build-out of additional development in the study area and throughout San Francisco and the region, and was based on output from the San Francisco County Transportation Authority's (SFCTA) travel demand model and land use projections developed by the San Francisco Planning Department. Therefore, potential cumulative future retail growth in the project vicinity was included in the cumulative transportation analysis.

San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. However, parking analysis has been conducted for this project to inform the public and the decision makers as to the parking conditions that could occur as a result of implementing the proposed project.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (*CEQA Guidelines* § 15131(a).)

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably address potential secondary effects.

3.0 ALTERNATIVES

3.1 Adequacy of Alternatives Analyzed and Presented

Comments

"The statement of project objectives is unduly narrow because it tends to limit CEQA's required development and evaluation of mitigation measures and project alternatives to a 'large retail project' in the project location. As the DEIR's limited discussion of alternatives suggests, the statement of objectives artificially limits the DEIR's alternatives and mitigation analysis by apparently ruling out alternatives other than a large new retail complex. The DEIR does not consider alternatives such as incorporating and reusing one or more of the existing buildings for retail, office, or commercial use. The statement of objectives should be broadened to allow consideration of creative reuse alternatives that will reduce the adverse impacts on the surrounding visual, architectural, and historic character of Mid-Market and permit the meaningful environmental review and analysis that CEQA requires." *(Arthur Levy, Attorney, December 21, 2009) [A-6]*

"5.1 Other than the No Project alternative, each of the alternatives selected is for the construction of a large new shopping center. This unreasonably limits consideration of alternatives and mitigations to a project that is substantially of the same character and scale as the one proposed. No alternative has been offered to enable consideration of incorporating and creatively reusing one or more of the existing buildings, either as part of the shopping center or as commercial or office space. A reuse alternative should be developed to enable the decision making bodies to evaluate mitigating the adverse impacts of the project on the existing buildings and the character of the Mid-Market corridor.

5.2 There is no explanation of the rationale for selecting the alternatives discussed.

5.3 There is no identification of any alternatives that were considered and rejected." *(Arthur Levy, Attorney, December 21, 2009) [A-19]*

Response

The commentor asserts that the development of the alternatives analyzed in the Draft EIR was limited by the project sponsor objectives and that the Draft EIR does not provide an explanation as to why alternatives, such as reuse of the existing buildings or the introduction of different land uses, were not included. The commentor also asks whether any alternatives were considered and rejected.

The alternatives evaluated in the EIR (the No Project, Reduced Intensity, and No Garage Alternatives) are identified in Section G, Alternatives, of the Initial Study,[21] on p. 103 (included as Appendix A to the EIR). These alternatives are analyzed in Chapter VI, Alternatives, of the EIR. In addition, the Reduced Parking Variant of the No Garage Alternative has been added. The analysis of project impacts for the Reduced Parking Variant is provided in Section D, Draft EIR Text Changes, under "Chapter VI, Alternatives." This variant of the No Garage alternative would result in the same size retail project as the proposed project, but would provide one level of below-grade parking with approximately 80 parking spaces instead of none with the No Garage Alternative or two levels of parking (188 spaces) with the proposed project. This variant is within the range of alternatives analyzed as part of the Draft EIR, but provides clarification of the potential impacts that would result from the provision of one level of parking instead of none or two levels.

As described on EIR p. VI.1, the rationales for the alternatives evaluated in the EIR are based on the City's assessment of the potential for reductions to or elimination of potentially significant and otherwise unavoidable project impacts related to transportation and traffic-related air quality. The No Project Alternative, Reduced Intensity Alternative, and No Garage Alternative and its Reduced Parking Variant analyzed in this EIR would continue to meet some or all of the project sponsor's objectives and would avoid or lessen the significant effects of the proposed project.

CEQA Guidelines Section 15126.6(a) requires an EIR to describe a range of reasonable alternatives to the project that would feasibly attain the general objectives of the project and avoid or substantially lessen any of the significant effects of the proposed project. *CEQA Guidelines* Section 15126.6(f) requires that the range of alternatives analyzed in an EIR be governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. It further states that alternatives should be limited to those that would avoid or substantially lessen any of the significant effects of the project and that the Lead Agency determines could feasibly attain most of the basic objectives of the project. Furthermore, the

[21] The Notice of Preparation of an Environmental Report / Initial Study was published October 1, 2008 and was made available for public review and comment until October 31, 2008.

CEQA Guidelines do not require that every conceivable alternative to the proposed project be evaluated.

Revisions or additions to EIR text in response to this comment are shown as indented text. New or revised text is underlined; deleted material is shown as ~~strikethrough~~ text.

The third full paragraph on EIR p. VI.1 has been revised to include the new Reduced Parking Variant among the list of alternatives and new text has been added to the end of the same paragraph to address the feasibility of the reuse of existing buildings and to explain why alternatives with different land uses than the proposed project were not considered.

> The following alternatives to the proposed project are discussed and evaluated in this chapter: A. No Project Alternative; B. Reduced Intensity Alternative; and C.1 No Garage Alternative. The No Garage Alternative includes a variant that would provide one level of subsurface parking – the Reduced Parking Variant to the No Garage Alternative (Reduced Parking Variant). The analysis for the Reduced Parking Variant is included as subsection C.2, following the analysis for the No Garage Alternative. Table VI.1 summarizes the significant effects of the proposed project and Alternatives B,~~and~~ C.1, and C.2 – the Reduced Parking Variant. The No Project Alternative is not included in this table. Alternatives either to reuse the existing structures on the project site or to provide a project with uses other than retail have not been included in the analysis. An alternative that would have reused the existing buildings was determined to be infeasible because it would not meet two primary objectives of the project sponsor: the provision of large floor plates to accommodate "value-based retailers;" and the development of a significant amount of net new retail space (see EIR p. II.1). In order to provide level floor plates across the three existing buildings, the floors of two or all three of the existing buildings would have to be removed and reconstructed to a uniform height. However, two of the existing buildings are one and two stories tall; thus a reuse alternative would not be able to provide the amount or type of retail space proposed by the project sponsor. In addition, the Initial Study concluded that the existing buildings are not considered historic resources for the purposes of CEQA. Thus, a reuse alternative would not result in reductions to or elimination of potentially significant impacts. Residential or office uses were not included as alternatives to be analyzed for the same reasons: these uses would not accommodate "value-based retailers" and would not generate the same amount of retail space as in the proposed project.

Draft EIR Text Changes

This text change is also shown in Section D, Draft EIR Text Changes, under "Chapter VI, Alternatives."

4.0 ADEQUACY OF EIR

4.1 Adequacy of EIR – General Comments

Comments

"The Transportation Analysis contained in this Draft EIR inadequately analyzes and mitigates the impacts of this project on pedestrian safety and circulation, bicycle safety and circulation, traffic impacts, and transit circulation." *(Tom Radulovich, Livable City, December 21, 2009) [H-1]*

"On these points the SF Bicycle Coalition respectfully finds the Draft EIR of the 935-965 Market Street (CityPlace) project to be inadequate and deficient, and we ask that the DEIR account for these points in a fair estimation of the true impacts of the project." *(Andy Thornley, San Francisco Bicycle Coalition December 21, 2009) [I-4]*

"I want to say that I believe the DEIR is sufficient and complete. And I want to thank you for your attention to it." *(Brian Sheehy, Local Business Owner, public hearing comment, December 10, 2009) [TR/K-2]*

"I just echo the thoughts of the last speaker, and I know we're not here on the merits. And I think the DEIR is sufficient and should move forward." *(Randy Shaw, Director, Tenderloin Housing Clinic, public hearing comment, December 10, 2009) [TR/L-1]*

"We support the draft EIR." *(Manny Flores, Carpenters Local 22, public hearing comment, December 10, 2009) [TR/N-1]*

"I read over the DEIR in great detail. I thought it was extremely well done." *(Planning Commissioner Michael Antonini, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/Q-1]*

"But I did think the analysis was very well done. And we'll have more discussion when the actual project comes in. But I think -- I received this in a very timely manner. The comment period is more than long enough and I am really happy with it." *(Planning Commissioner Michael Antonini, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/Q-3]*

Response

General comments regarding the overall adequacy or inadequacy of the Draft EIR are noted. Specific comments regarding the adequacy or inadequacy of the environmental analysis are addressed in this C&R document by environmental topic. The San Francisco Planning Commission will consider the adequacy and completeness of the EIR based upon the administrative record as a whole at a public meeting on certification of the Final EIR.

5.0 MERITS OF THE PROPOSED PROJECT

5.1 Comments in Support of the Proposed Project

Comments

"I support any type of business investment in this long-neglected neighborhood. Our business has been in operation there since 2002. I have many good things to say about City Place, although I know today's comments are restricted to the DEIR." *(Brian Sheehy, Local Business Owner, public hearing comment, December 10, 2009) [TR/K-1]*

"I do want to add that the location of this project is really vital to the revitalization of the lower part of Turk and the Tenderloin. If you look at the division it is almost like 200 yards. This is really the fact that this site has laid fallow for so long has really hurt the Tenderloin community. So hopefully this can move forward. It's going to be a dynamic project, and the sooner the work gets created it will make it a safer area for the lower Turk and improve businesses in the Tenderloin, and when we get to the merits it gets my full support." *(Randy Shaw, Director, Tenderloin Housing Clinic, public hearing comment, December 10, 2009) [TR/L-2]*

"And I am here to support the project as a critical piece to the rehabilitation and improvement of the Market Street neighborhood." *(Carolyn Diamond, Executive Director, Market Street Association, public hearing comment, December 10, 2009) [TR/M-1]*

"Pedestrian increases, which is cited in the EIR, will add 1,234 pedestrian trips around the project site. This increase of pedestrian travel, which the 30-foot Market Street sidewalks can accommodate, will add to the vitality of this block, create critical mass, and help establish a safer, more comfortable emotional sense for those in the area." *(Carolyn Diamond, Executive Director, Market Street Association, public hearing comment, December 10, 2009) [TR/M-3]*

"With the neighborhood development of residential units including projected 1,700 new units at Market and Eight Street, this type of retail project will be invaluable to the Market Street new residents. This retail will allow the new residents to shop nearby and not have to travel to other shopping destinations.

The concerns about this project are legitimate, but I am sure that they can be mitigated. For me, the bigger concern is if this retail project cannot be built, what can? What will invigorate and rehabilitate this neglected stretch of mid-Market Street?" *(Carolyn Diamond, Executive Director, Market Street Association, public hearing comment, December 10, 2009) [TR/M-4]*

"We are looking for your approval come spring. Market Street, boy, I'll tell you, it needs it. And we are looking forward to it, and we look forward to your approval come 2010." *(Manny Flores, Carpenters Local 22, public hearing comment, December 10, 2009) [TR/N-2]*

"I think the concept of improving this section of Market Street is obviously long awaited. And I appreciate the fact that the proposed tenants will put a new mix of retail in the immediate downtown area and will provide for what we have already been providing, a shopping area for the residential that we have been putting into the general area and will continue to do so." *(Planning Commissioner Ron Miguel, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/O-1]*

"Commissioner Lee made a good point. But prospective shoppers in this complex are not just people from outside San Francisco and tourists but San Franciscans themselves who typically will drive out of the City or -- to get -- to make durable good purchases, and tax revenue goes to other places. This is sort of the Home Depot argument and others that have come up before. But if you don't make it convenient for them, they'll go where it is convenient. And if we hope for this to work, we've got to make it so people can come and they can purchase. Otherwise it becomes a mail-order type situation where, you know, you just go in and pick something out and it gets sent to you. But you don't have the jobs and you don't have the merchandise onsite if people can't take that merchandise with them when they leave." *(Planning Commissioner Michael Antonini, San Francisco Planning Commission, public hearing comment, December 10, 2009) [TR/O-4]*

Response

These comments express general support for the proposed project. They are not comments on the scope and adequacy of the EIR and therefore only require acknowledgement in this C&R document. The comments will be transmitted to the decision-makers and may be considered in their determination whether to approve, modify, or disapprove the proposed project.

COMMENTS ON EIR APPENDIX A: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY

6.0 LAND USE PLANNING/AESTHETICS

6.1 Mid-Market Corridor

Comments

"The DEIR does not address the historic or architectural value of the buildings proposed to be demolished, or their contribution to the historic, architectural, and visual character of Mid-Market." *(Arthur Levy, Attorney, December 21, 2009) [A-2]*

"In sum, the DEIR does not contain sufficient discussion, study, and illustrative and photographic material to enable the decision making bodies to evaluate the historic, architectural, and visual impacts of the project, not only on the buildings to be demolished, but also on the character of Mid-Market. This letter is intended to assist the Planning Commission and the Board of Supervisors in achieving meaningful and good faith environmental review of these dimensions and impacts of the project." *(Arthur Levy, Attorney, December 21, 2009) [A-5]*

"The statement of environmental characteristics does not contain a discussion of Mid-Market's architectural, visual, and historic context sufficient to enable the decision making bodies to evaluate the impact of demolition of the existing buildings and construction of a new shopping center on the Mid-Market corridor." *(Arthur Levy, Attorney, December 21, 2009) [A-7]*

"The statement of environmental characteristics should be revised to place the project in the context of the visual, architectural, and historic character of Mid-Market, including the Powell and Market hub, the surrounding landmark buildings, and the two adjacent Historic Districts." *(Arthur Levy, Attorney, December 21, 2009) [A-10]*

"The environmental setting discussion likewise does not provide a baseline of conditions sufficient to enable the decision making bodies to evaluate the impacts of the project on the visual, architectural, and historic character of Mid-Market. As noted above, the DEIR fails to place the existing buildings on the project site and the proposed new construction in their Mid-Market context. The environmental setting sections should provide information to enable a good faith evaluation of the relationship between the existing buildings and the proposed new shopping center and the character of the commercial district, including Powell and Market, the surrounding landmark buildings and the two Historic Districts." *(Arthur Levy, Attorney, December 21, 2009) [A-12]*

"3.3 As noted above, apart from the significance of these buildings as historical resources themselves, the DEIR fails to assess the impact of their demolition and replacement with a modern shopping center on the visual, architectural, and historic character of the surrounding district." *(Arthur Levy, Attorney, December 21, 2009) [A-16]*

"3.4 The DEIR does not analyze the cumulative impact of the demolition of these buildings and their replacement with a large modern building on the character of the Mid-Market corridor. There is no list of past, ongoing, and expected future demolitions or reference to any adopted study that might be sufficient to support a cumulative impact determination in compliance with CEQA Guideline § 15130(b)(I)." *(Arthur Levy, Attorney, December 21, 2009) [A-17]*

Response

The commentor states that the Draft EIR does not adequately address the visual, architectural, and historic character of the existing buildings that would be demolished, or the effects on the Mid-Market area of replacing the buildings onsite with a modern building.

These environmental topics were addressed in the Notice of Preparation of an Environmental Impact Report/Initial Study (NOP/IS), in Appendix A of the Draft EIR. The NOP/IS discusses the location and setting of the project site appropriately with respect to neighborhood character on NOP/IS pp. 17-19, including the location of the proposed project within the Mid-Market area.[22] The proposed project's consistency with the *Downtown Area Plan* of the *General Plan* is presented on NOP/IS pp. 22-23. The description of the proposed Redevelopment Plan and Special Use District for the Mid-Market area and the status of the proposed Redevelopment Plan are also presented on these pages. No land use impact is identified under Land Use Topic 1c, Would the proposed project "Have a substantial impact upon the existing character of the

[22] The Mid-Market area is a proposed redevelopment project area bounded by Fifth Street to the east, Mission Street to the south, between Tenth and Eleventh Streets to the west and about a block off of Market Street to the north. The original survey area was established December 4, 1995. The purpose was to develop an incremental 30-year urban infill and rehabilitation program that would authorize the Redevelopment Agency to participate in and/or assist with certain projects and programs that, taken together, aim to create a more vibrant and balanced mixed-use district over time. To date, the Mid-Market Redevelopment Project area has not been implemented. Information is available online at http://www.sfredevelopment.org/index.aspx?page=151. Accessed May 4, 2010.

vicinity?" (see NOP/IS pp. 27-28) for the following reasons. Although the Mid-Market area includes many distinguished buildings, some of which are listed on the National Register of Historic Places, the Mid-Market area is not a designated historic district nor has any area within the Mid-Market corridor been identified as a potential Mid-Market historic district. Although there are several historic districts in the project vicinity, the proposed project is not within any identified historic district. The proposed new building's impact on off-site historic resources in the immediate area is analyzed on NOP/IS p. 31 under Aesthetics, because these resources are considered scenic resources. In addition, the potential impacts on off-site historic resources and historic districts is discussed on NOP/IS pp. 40-41, and NOP/IS p. 41 states that the proposed project would not have a significant impact on off-site historic resources under CEQA. See also Response 8.5 - Evaluation of Potential Adverse Impacts to Historic Districts and Off-Site Historical Resources.

The commentor cites to *CEQA Guidelines* § 15130(b)(1) to indicate that the analysis of cumulative impacts on the visual, architectural, or historic character of the Mid-Market area is not fully addressed. *CEQA Guidelines* § 15130(b)(1) provides guidance on how a cumulative impact analysis should be carried out, the section does not mandate that a discussion be included in the environmental review document. As stated in *CEQA Guideline* § 15130(a), a discussion of cumulative impacts is triggered when a project-related impact is identified as having an incremental effect that is cumulatively considerable. When the incremental effect is not cumulatively considerable, only the basis for that conclusion need be provided. Since the NOP/IS did not identify any potentially significant impacts on land use, aesthetics, or historic architectural resources, the *CEQA Guidelines* do not require the inclusion of a cumulative discussion. However, as explained above, the project site is located within the boundaries of the Mid-Market area. The cumulative impact on the visual, architectural, or historic character of the Mid-Market area that would result from the demolition of the 949 Market Street Building (St. Francis Theater) was considered in the *Mid-Market Redevelopment Plan EIR* since the redevelopment of the 949 Market Building – with 140 condominiums and 120 parking spaces – was included as a future project in the *Mid-Market Redevelopment Plan EIR*. The other two on-site buildings are not specifically discussed since no proposals were being advanced at that point in time. The impact conclusions there indicate that implementation of the *Mid-Market Redevelopment Plan* would reduce physical blight in the area, and, in the process, improve the overall land use character as well as maintain and/or enhance the existing visual character of the Mid-Market area.

This conclusion supports those made in the NOP/IS for the 935-965 Market Street project, that no significant land use, aesthetic, or historic resource impacts would occur and therefore the proposed project would not contribute to cumulative impacts. No list of past, present, or future development is needed.

7.0 POPULATION AND HOUSING

Comments

"Regarding: pg V.2 section A. Growth Inducement. The Initial Study concluded that the increase in employment on the project site could potentially result in an increase in the demand for housing, assuming conservatively that at least some of the new retail employees on the project site would be new to San Francisco, this potential increase in housing demand as a result of the proposed project would not be considered substantial in the context of total housing demand in San Francisco. A 3.1% increase is very substantial in the context of total housing demand in San Francisco. There already isn't enough housing. A mixed-use housing and retail project may be more appropriate for this project or the development of middle-class level housing at another site could mitigate the increase in demand for housing that will occur as a result of this project. I doubt the new retail employees will be moving into Rincon Hill as that is out of most people's price point who work retail. See also pg 35 of Appendix A Initial Study where it states: 'Although housing demand in and of itself is not a physical environmental effect, an imbalance between local employment and housing can lead to long commutes with associated traffic and air quality impacts'." *(Laura Kennedy, December 7, 2009) [G-3]*

Response

The comment states that a 3.1 percent increase in housing demand would be substantial in the context of total housing demand and suggests mitigation. The housing demand generated by the new employees of the proposed project would contribute to an existing unmet demand for housing, especially affordable housing, in the City. As stated on NOP/IS pp. 34-35, in Appendix A to the EIR, the actual increase in housing demand compared to existing conditions would be lower. In the analysis all employees are conservatively assumed to be new to San Francisco, which would likely not be the case, and, in addition, the employees in the general office and retail space that was occupied at the time of the publication of the NOP/IS are not accounted for in the total.

Housing demand from employment generated by the proposed project would be 3.7 percent of the City's estimate of growth in the City's households between 2005 and 2010, or about 0.1 percent of the total estimated number of households in the City in 2010. EIR pp. V.1-V.2 have been revised to correct the percent increase of the City's household growth, replacing "3.1" with the correct "3.7", as shown below. This correction makes the text consistent with the calculations in footnote 2 on EIR p. V.2. Changes to the last sentence on EIR p. V.1 (which continues onto EIR p. V.2) and the first sentence on EIR p. V.2 are shown below in strikethrough and underline:

> Based on assumptions about commute patterns and household size, the proposed project (with an estimated 750 employees) would generate a potential demand for about ~~295~~ 344 new dwelling units in San Francisco.[33] These new households would represent about ~~3.1~~ 3.7 percent of the City's estimated household growth by the year 2010.

This change from 3.1 to 3.7 percent of the projected growth in the number of households does not affect the conclusion stated on Initial Study p. 35. The NOP/IS concluded that the proposed project's share of the growth in the number of new households (3.1 percent or 295 of the approximately 9,400 households added to San Francisco between 2005 and 2010) would generate demand in the local housing market; however, even considering this change to the projected growth in the number of households, the volume of demand would not be substantial in the context of the approximately 348,300 San Francisco households expected by 2010.

It is important to note that the environmental review for the *Mid-Market Redevelopment Plan* included an analysis of adding up to 3,300 new housing units (15 percent would be affordable) and 5,390 new jobs to the area and that this analysis was incorporated into the 935-965 Market Street NOP/IS on pp. 34-35. The project site was identified as a development opportunity site in the *Mid-Market Redevelopment Plan EIR,* which concluded on pp. 49-50 (as cited in the 935-965 Market Street NOP/IS, footnote number 31, p. 34) that the addition of 5,390 jobs would be considered small in relation to the overall number of jobs created in the City.

Also of note is the fact that projects that propose the addition of 25,000 square feet or more of retail space are subject to *Planning Code* Section 313 – Housing Requirements of Large–Scale Development Projects. *Planning Code* Section 313 establishes a jobs-housing linkage fee for entertainment, retail, hotel, office, research and development projects of 25,000 or more square feet. The charge is currently $18.62 per square foot of retail and entertainment development, $19.96 per square foot of office development, $14.95 per square foot for hotel, and $13.30 per square foot for research and development. The project sponsor would make an in-lieu development impact fee payment, thus fulfilling the requirements of the *Planning Code* and addressing the demand for affordable housing generated by the proposed project's new San Francisco employees.

Draft EIR Text Changes

This text change is also shown in Section D, Draft EIR Text Changes, under Chapter V, Other CEQA Considerations.

8.0 HISTORIC ARCHITECTURAL RESOURCES

8.1 City Policies and Procedures with Respect to Evaluation and Analysis of Historic Resources

Comments

"3. What were the comments of the City Planning Department's Preservation Technical Specialists on the historic resources evaluation?

4. What were the comments of the Historic Preservation Commission (HPC) on the DEIR? If the HPC did not review the DEIR, why was it not scheduled for a hearing?" (*Planning Commissioner Hisashi Sugaya, December 10, 2009) [E-2]*

"I would like to know in the response to comments what the preservation tax *[tech]* specialist in the Department's comments were on the DEIR. Also I don't believe this has gone to the Historic Preservation Commission. If not, I'd like to know why it wasn't sent for their comments since it does involve historic resources. (*Planning Commissioner Hisashi Sugaya, public hearing comments, December 10, 2009) [TR/P-2]*

Response

The commentor requests information regarding the Department Historic Preservation Technical Specialist's (Preservation Technical Specialist) comments on the historic resource evaluation for the proposed project. The commentor wishes to know if the Draft EIR for the project was presented to the Historic Preservation Commission (HPC). The commentor suggests that the Draft EIR should have been presented for comment to the HPC as the proposed project involves historic resources.

Preservation Bulletin No. 16 prepared by the San Francisco Planning Department (the Department) sets forth the Department's CEQA Review Procedures for Historic Resources.[23] These procedures describe the process and requirements for the review of project proposals involving potential historic resources. In 2006, the Major Environmental Analysis Division of the Department (MEA) submitted requests for Historic Resource Evaluation to the Department's Preservation Coordinator for the project proposed at 935-965 Market Street so that it would be evaluated with respect to potential impacts on historic resources. At the time, the proposed project consisted of the demolition of the three buildings on the project site and the new construction of a 10-story mixed-use building.

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[23] San Francisco Planning Department. 2008. *San Francisco Planning Department CEQA Review Procedures for Historic Resources*. Online at http://www.sfplanning.org/Modules/ShowDocument.aspx?documentid=5340. Accessed May 4, 2010.

The proposed project was reviewed by a Preservation Technical Specialist, who prepared a Historic Resource Evaluation Response memorandum dated August 25, 2006 (2006 HRER).[24] The 2006 HRER set forth the reasons for a determination that none of the three existing buildings on the project site proposed for demolition are historical resources. However, the 2006 HRER noted that additional information was needed to determine whether or not the proposed project would have an adverse effect on off-site historical resources. Information regarding the proposed project's design and cladding materials would be needed to complete the evaluation with respect to off-site historical resources. In particular, the 2006 HRER determined that the proposed project would need to be evaluated for potential impacts to the Market Street Theater and Loft District, the Kearny-Market-Mason-Sutter Conservation District as well as to the individual historic resources located at 950-964 Market Street, 972 Market Street and 978-980 Market Street.

The proposed project was modified in early 2007 from a mixed-use project to the current five-story retail project. To address potential impacts to off-site historic resources identified in the 2006 HRER, the project sponsor retained an historic preservation architectural consulting firm to conduct the required Historic Resource Analysis (2007 HRE).[25] The 2007 HRE analysis focused on the effects of the proposed project on the character of the neighborhood as well as on the historic status of the neighboring historic resources and historic districts. The resulting 2007 HRE was reviewed by a Department Historic Preservation Technical Specialist. Based upon the 2007 HRE, the 2006 HRER and other available documentation, a revised HRER was completed by a Department Preservation Technical Specialist in November 2007 (2007 HRER).[26]

In the 2007 HRER the Preservation Technical Specialist determined that the proposed project would not have significant impacts on either on-site or off-site historical resources. The buildings proposed for demolition as part of the proposed project were not known or potentially-eligible historic resources for the purposes of CEQA, and the design of the proposed new construction was found not to have an adverse impact on off-site historic resources because it would be within the range in height found in the project vicinity, would be compatible in terms of use, scale and volume established by the existing development pattern along the mid-Market Street corridor and

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[24] San Francisco Planning Department. *Historic Resource Evaluation Response for 935-949 Market Street*, (hereafter "2006 HRER"), August 25, 2006. This document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

[25] Page & Turnbull, *Historic Resource Analysis for 935-965 Market Street*, (hereafter "2007 HRE"), September 18, 2007. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

[26] San Francisco Planning Department, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, (hereafter "2007 HRER"), November 1, 2007. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

vicinity, is not located within any a defined historic district, and would not materially impact any adjacent historic resources or their environment.[27] See also Response 8.6 - Evaluation of Potential Adverse Impacts to Historic Districts and Off-Site Historical Resources, below.

The Department determination in the 2007 HRER was summarized in the Initial Study prepared for the proposed project and published October 1, 2008. The first citation to the 2007 HRER is provided in footnote 25 on p. 31 of the NOP/IS, which is attached as Appendix A to the EIR. The 2007 HRER is referred to by title only in Topic 4. Cultural and Paleontological Resources on NOP/IS p. 36. For clarification, the citation in footnote 35 on p. 36 of the NOP/IS is revised as follows:

> [35] San Francisco Planning Department, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, memorandum November 1, 2007. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

The public comment period for the NOP/IS for this project was from October 2, 2008 to October 31, 2008. No comments regarding the method used for the analysis or the conclusions of the analysis with respect to historic resource issues were received by the Planning Department during the NOP/IS comment period. Therefore, the issue of Cultural Resources with respect to historic architectural resources was scoped out of the Draft EIR.[28]

As described above, the Department's procedures with respect to historic resource evaluation were followed in the environmental evaluation of the proposed project. A Department Historic Preservation Technical Specialist evaluated the project proposal and determined that there would be no significant adverse effects with respect to historical resources as a result of the proposed project. See also Responses 8.2, 8.3, 8.4, 8.5 and 8.6, below, for additional information about the evaluation of impacts on historical resources under CEQA for this EIR.

The NOP/IS was published and distributed pursuant to the requirements of CEQA and *San Francisco Administrative Code* Chapter 31. The full NOP/IS document, as opposed to a Notice of Availability for the NOP/IS, was mailed to the Landmarks Preservation Advisory Board in October of 2008. This occurred prior to the creation of the Historic Preservation Commission.[29]

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[27] 2007 HRER.

[28] *CEQA Guidelines* Section 15063 (c)(3)(A) identifies that one purpose for an Initial Study is to assist in the preparation of an EIR by focusing the EIR analysis on potentially significant effects. Environmental topics for which the project effects are found to be less than significant in an Initial Study or for which the Initial Study identifies mitigation measures that reduce potentially significant impacts to less than significant need not be addressed in the EIR for that project.

[29] In November 2008 San Francisco voters approved the creation of the Historic Preservation Commission (HPC) through the passage of Proposition J. The HPC replaced the Landmarks Preservation Advisory Board. The first meeting of the Historic Preservation Commission took place on Wednesday, February 4, 2009.

The commentor asks why the proposed project was not presented at a hearing before the HPC. Since the Planning Department determined that there are no historic resources on the project site, and also that the project site is not within an historic district and would not adversely impact off-site historic resources, no hearing before the HPC is required. As stated above, no comments suggesting that either the evaluation of potential impacts to historic resources or the scope of the EIR with respect to cultural resources were inadequate were received during the NOP/IS comment period.

Draft EIR Text Changes

The following text change would be made to footnote 35 on NOP/IS p. 36 in Appendix A of the EIR and is shown in Section D, Draft EIR Text Changes, under EIR Appendix A: Notice of Preparation/Initial Study.

> [35] San Francisco Planning Department, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, memorandum November 1, 2007. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

8.2 Consultation Regarding Historic Resources

Comments

"1.3. Absence of Consultations: The project description does not reflect any consultation with the National Park Service or the State Historic Preservation Office, which oversee the National Register Historic Districts and the adjacent National Register buildings." *(Arthur Levy, Attorney, December 21, 2009) [A-11]*

Response

No consultation at the Federal level with the National Park Service (NPS), or at the State level with the California Office of Historic Preservation (OHP), is required for the proposed project. None of the buildings on the project site are listed on the National Register of Historic Places or included in the California Register of Historical Resources. The proposed project is not a project that would require review under Section 106 of the National Historic Preservation Act. The project sponsor is not seeking certification of the proposed project under the Federal Historic Preservation Tax Credit program. Because of this, no consultation with NPS, OHP, or any other state, federal, or local agency is required.

Although such consultation is not required, a copy of the NOP/IS for the proposed project was sent to OHP on October 1, 2008, as part of the publication and distribution of that document. OHP did not comment on the NOP/IS and has not commented on the proposed project.

8.3 Reliance on Previous Studies

Comments

"5. The DEIR repeatedly cites the conclusions of the Mid-Market Redevelopment Plan Final EIR as part of Question 4a of the Initial Study. The historic resources evaluation conducted for that document, which includes the DEIR, is now at least 10 years old. No evaluation is cited as to why a decade old survey is currently adequate for evaluation today. It would be helpful to know what methodology was used to prepare the historic resources evaluation for the DEIR, the assumptions behind using potentially outdated historic resource evaluations and whether any conclusions from past works, studies, etc. were verified and observed in the field, including looking behind the concealments." *(Planning Commissioner Hisashi Sugaya, December 10, 2009) [E-3]*

"The DEIR continually references the mid-Market redevelopment plan, final EIR for much of its analysis of historic resources. In fact, the historic resource survey that was -- that was done for the mid-Market plan was done over 10 years ago. And I think some reassessment is in order." *(Planning Commissioner Hisashi Sugaya, public hearing comments, December 10, 2009) [TR/P-3]*

Response

The commentor requests confirmation that the Planning Department Preservation Technical Specialist evaluated the potential impacts of this proposal with respect to historic resources. In addition, the commentor requests confirmation that the Department's determination that there would be no significant adverse effects with respect to historical architectural resources did not rely on older analysis or studies without consideration of whether the methodology used in the past is still valid.

As described in Response 8.1, the current project proposal was evaluated by a Department Preservation Technical Specialist as part of this environmental review. The Department Preservation Technical Specialist's assessment with respect to historic resource impacts was based upon information and analysis in earlier studies in conjunction with additional information. The additional information consisted of information provided by the project sponsor and the historic architectural consultant engaged to perform supplemental analysis as well as information within the Department's records. The conclusions presented in the NOP/IS were based upon the Department's determination in the 2007 HRER.[30]

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[30] San Francisco Planning Department, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, memorandum November 1, 2007. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

In evaluating the potential for significant impacts to historic resources for any project, the Department Preservation Technical Specialist must first determine whether or not the subject building(s) onsite are historic resources. In this case, a number of source materials were evaluated to reach the Department's determination. As previously stated, supplemental historic information was provided by the Project Sponsor. The Department maintains its own background files related to historic resources. In addition, the Preservation Technical Specialist also reviewed information, analysis, and conclusions of earlier EIRs with respect to the potential for the presence of historical resources on the project site (the *Mid-Market Redevelopment Plan EIR,*[31] prepared in 2003, and the *949 Market Street EIR,*[32] prepared in 2002 for a previous project proposed for that site) as well as the background documents on which these EIRs rely (the *Mid-Market Historic Resources Survey*[33] and the *Historic Resources Study: St. Francis Theater, 949-961 Market Street, San Francisco*[34] respectively). All of the above information was utilized by Department Preservation Technical Specialist(s) in exercising his/her independent professional judgment in applying the California Register criteria to make a determination with respect to historic architectural resource impacts for the proposed project.

Recent site visits conducted by Page & Turnbull (January 25, 2010 and February 19, 2010) reconfirmed the findings of Page & Turnbull's Historic Resource Evaluation (HRE) for 949 Market Street, which was originally completed in 2001.[35] Page and Turnbull reviewed the methodology used to evaluate the property in 2001 and confirmed that the approach and methodology established at that time remain valid and are appropriate for the currently proposed project. The Department concurs with Page and Turnbull's assessment.

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[31] San Francisco Redevelopment Agency/San Francisco Planning Department, *Mid-Market Redevelopment Plan Final Environmental Impact Report*, certified September 18, 2003. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2002.0805E.

[32] San Francisco Planning Department, *949 Market Street Environmental Impact Report*, certified March 7, 2002. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2000.0965E.

[33] Carey & Company, *Mid-Market Historic Resources Survey*, August 2001. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2002.0805E.

[34] Page & Turnbull, *Historic Resources Study: St. Francis Theater, 949-961 Market Street, San Francisco*, September 2001. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2000.0965E.

[35] Page & Turnbull, *Memorandum: 935-965 Market Street Site Visits (1/25/10 and 2/19/2010),* March 26, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

8.4 Historic Architectural Significance – 947-965 Market Street[36]

Comments

"The evaluation dismisses the historic significance of the building by saying 'the building no longer retains integrity (of design, material, workmanship, setting, feeling and association) such that it no longer conveys its historic architectural significance.'

1. There are seven aspects of integrity. Why are only six cited? Note: this also applies to the other two properties.

2. There is no evaluation of any of the 'aspects' that define the integrity of a historic resource. Please respond by providing a detailed evaluation of all seven aspects of integrity for all properties.

Although much of the façade is currently covered over and therefore not visible, an investigation should be made of what exists underneath. Evidence of the upper level windows shows that, at least what is visible, has been changed from the original (as shown on page 93, Splendid Survivors). However, an evaluation is required of whether the changes to the Market Street façade have gained historic significance over time. The upper windows were removed and replaced. Aren't these windows representative of a time, style and other evaluative criteria that make them a historic part of the evolution of the building?

And what about the storefronts and other parts of the façade that are currently covered up? The DEIR says 'including...concealment of large portions of the façade...' Concealment cannot be used as a factor to dismiss an evaluation of integrity. If that was acceptable, any project sponsor could place plywood over various parts of a building concealing what is behind. For purposes of a CEQA do we then say that because it isn't visible, it has no integrity? An evaluation is required of what actually exists behind what is 'concealed,' including descriptions and an evaluation of whether any modifications over time have gained historic significance of their own, even though they post-date the original design." (*Planning Commissioner Hisashi Sugaya, December 10, 2009) [E-1]*

"3.1 The DEIR fails to assess the significance of St. Francis Theater and retail shops at 947-964 Market Street as an historical resource. The St. Francis is a rare surviving San Francisco work of renowned architect John Galen Howard (1864-1931); the Supervising Architect of the Master Plan for University of California at Berkeley and the founder of the UC School of Architecture. Howard designed Berkeley's world famous Campanile and Doe Memorial Library, among several other National Register buildings on the Berkeley campus. In San Francisco, he designed the Adam Grant Building and the Bill Graham (Civic) Auditorium, but few other surviving commercial buildings and no other surviving theater.

3.1.1 The St. Francis operated as a movie theater and retail shops from its opening in 1910 until its closing in 2001. The St. Francis is individually rated in the San Francisco Downtown Survey as Category "B" ("of individual importance by

[36] In previous CEQA documents and Historic Resource Evaluations, the St. Francis Theater has been identified as 949 Market Street and 949-961 Market Street.

virtue of architectural, historical and environmental criteria"), and as a "Priority I" building (meaning highest priority for preservation) on the UMB survey.

3.1.2 Entirely apart from the former movie theater auditorium, the St. Francis contributes to the character of the block through the ornament and fenestration on the facade of the retail shops on Market Street. The theater is located behind the shops, and is accessed though a passageway at the west end of the building." *(Arthur Levy, Attorney, December 21, 2009) [A-13]*

"3.1.3 The character defining façade ornament and windows opening onto Market Street remain intact beneath the signage and are restorable, as are the retail shops themselves. The Downtown Survey reported that although the window wall composition has been covered up by signage, the 'Handsome Renaissance/Baroque ornamentation is still visible, primarily in the cornice.'

3.1.4 As a theater, the St. Francis is listed in the city's 2006 Context Statement as a candidate for the 'San Francisco Neighborhood Movie Theater Non-contiguous Multiple Property Historic District.' There is a dispute as to the integrity of the theater auditorium and whether 'all historic fabric' has in fact been removed. The City should allow investigation and substantiation of a recent eyewitness report that the auditorium remains intact before proceeding further." *(Arthur Levy, Attorney, December 21, 2009) [A-14]*

"I am writing about the proposed 'City Place' commercial development for 935-965 Market Street, case 2005.1074E, block3704, lots 71-2-3. The current proposal requests permission to totally demolish the three existing buildings and replace them with one large contemporary building. It makes a case that the original buildings have been so altered over the years, that there is nothing of historic value to preserve. I disagree. I request that the developer be required to preserve the existing front facades, and restore them to their original 1909 appearance. There are many remnants of the original facades visible. I support the overall project concept and anything that can improve Market Street between 5th & 8th, but I hate to lose the beautiful facades and have them replaced with a cold, flat, uninteresting "varied glass curtain wall system" (page 7 of the Initial study). I would propose constructing the new building behind and above the historic facades." *(Jane Weil, November 20, 2009) [B-1]*

"The evaluation says that the building has no integrity and cites six aspects of integrity. There are actually seven, so I think the seventh one needs to be addressed. Also there is no evaluation of the seven aspects of integrity. It just says they aren't met. And I don't know why. There are also arguments in there that the facade is covered over and therefore is invisible, and the use of terms like 'concealment of large portions of the facade,' I think someone needs to go take a look at the buildings again because concealment really can't be used as a factor to dismiss the evaluation of integrity." *(Planning Commissioner Hisashi Sugaya, public hearing comments, December 10, 2009) [TR/P-1]*

Response

The commentors disagree with the determination that 949 Market Street is not a historic resource. As discussed under Response 8.1 above, the topic of historic architectural resources is addressed in the NOP/IS, which is included in the EIR as Appendix A. The NOP/IS presented the results of

an evaluation for this project proposal regarding whether a historical resource is present on the project site, and analyzed potential impacts to both on-site and nearby off-site historical resources. The 2007 HRER, on which the NOP/IS relied, describes each of the subject buildings on the project site, summarizes their historic status on various historic architectural surveys for the area, presents the results of an evaluation of the integrity of each building, and assesses the eligibility of each building on the project site for inclusion in the California Register of Historic Places. The NOP/IS and 2007 HRER conclude that project site does not contain any historic resources, as defined under CEQA, nor is the project site within any existing or identified potential historic district. Therefore, demolition of the three existing buildings on the project site would not have a direct impact on any on-site or off-site historic resource or historic district. For this reason, the topic of historic architectural resources was excluded from further study in the EIR, as permitted by *CEQA Guidelines* Section 15063(c)(3)(A), which provides that the purposes of an Initial Study include focusing the EIR on effects determined to be significant.

The remainder of this response addresses comments related to the Department's historic resource determination for 949 Market Street (St. Francis Theatre). The conclusions in the NOP/IS and the 2007 HRER[37] rely on information, analysis, and conclusions of earlier EIRs with respect to the potential for the presence of historical resources on the project site (the *Mid-Market Redevelopment Plan EIR,*[38] prepared in 2003, and the *949 Market Street EIR,*[39] prepared in 2002 for a previous project proposed for that site) as well as the background documents on which these EIRs rely (the *Mid-Market Historic Resources Survey*[40] and the *Historic Resources Study: St. Francis Theater, 949-961 Market Street, San Francisco*[41] respectively).

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[37] San Francisco Planning Department, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, memorandum November 1, 2007. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

[38] San Francisco Redevelopment Agency/San Francisco Planning Department, *Mid-Market Redevelopment Plan Final Environmental Impact Report*, certified September 18, 2003. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2002.0805E.

[39] San Francisco Planning Department, *949 Market Street Environmental Impact Report*, certified March 7, 2002. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2000.0965E.

[40] Carey & Company, *Mid-Market Historic Resources Survey*, August 2001. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2002.0805E.

[41] Page & Turnbull, *Historic Resources Study: St. Francis Theater, 949-961 Market Street, San Francisco*, September 2001. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2000.0965E.

The historic architectural resource discussion in the NOP/IS summarized the Department's determination which properly relied on the analysis and conclusions of the above referenced documents. The recent site visits conducted by Page & Turnbull (January 25, 2010 and February 19, 2010) reconfirmed the findings of Page & Turnbull's Historic Resource Evaluation (HRE) for 949 Market Street, which was originally completed in 2001.[42] Page and Turnbull reviewed the methodology used to evaluate the property in 2001 and confirmed that the approach and methodology established at that time remain valid and are appropriate for the currently proposed project.

As described in Table 1, Summary of Ratings under Existing Surveys, on NOP/IS p. 38 in Appendix A of the EIR, 949 Market Street is included in California Historic Resource Inventory System database (CHRIS) with a status of 3S. This status indicates that the building appears eligible for listing as an individual resource, but listing in this database does not mean that the building is a historic resource. Subsequent evaluations by experts that meet the Secretary of the Interior's Professional Qualification Standards determined through additional information that the subject building no longer retains sufficient integrity to be considered a historic resource for the purposes of CEQA. The information that the building at 949 Market Street was analyzed by a qualified expert (Page & Turnbull 2001) and determined not to be a historic resource is discussed on NOP/IS p. 39. As more particularly described below, the Department 2007 HRER reaffirmed the prior determination that the building no longer retains integrity and is no longer a historic resource.

As noted in Comments E-1 and TR/P-1 above, there are seven aspects of integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association. According to the National Park Service's *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, integrity is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance."

On p. 40 of the NOP/IS the analysis states that "the building no longer retains integrity of design, material, workmanship, setting, feeling and association." Location was not included among the items on this list because the building continues to retain integrity of location, inasmuch as it has not been relocated. This is specifically mentioned in the 2007 HRER prepared by the Department Preservation Technical Specialist. However, as described below, integrity of location alone is not sufficient to allow the building to convey its historic significance.

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[42] Page & Turnbull, *Memorandum: 935-965 Market Street Site Visits (1/25/10 and 2/19/2010),* March 26, 2010. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

The NOP/IS for the proposed project summarizes the 2007 HRER determination and conclusion by the Department Historic Preservation Technical Specialist with respect to the integrity and historic status of the building at 949-961 Market Street. The evaluation as to this building's integrity by the Preservation Technical Specialist was based upon the descriptions, analyses, and conclusions of several studies including the 2007 HRER prepared as part of the environmental review for this project.

According to the 2001 *Historic Resources Study: St. Francis Theater, 949-961 Market Street, San Francisco*:

> The interior, already heavily remodeled in 1925, was completely demolished in 1968. In this remodel/reconstruction the original auditorium and balcony were replaced with two smaller auditoriums: one in the basement and another above it. No historic material or features survive in the auditorium wing. The new materials are utilitarian: with gypsum board walls, suspended acoustical tile ceilings and carpeted concrete floors.[43]

As discussed in the 2001 Page and Turnbull *Historic Resource Study*, the significance of some building types is defined by their exteriors, while for other building types, like theaters, it is defined by their interiors. According to *National Register Bulletin 15*, a building whose main architectural features are interior would "lose value as a historic resource" if it were to "lose its interior."[44]

The 2002 *949 Market Street EIR*, and 2001 Page and Turnbull *Historic Resource Study*, on which that EIR relied, provide a description, analysis and evaluation of the integrity of this building under each of the seven aspects of integrity. The 2002 EIR concluded that although 949 Market retained integrity of Location, it did not retain integrity of Design, Setting, Materials, Workmanship, Feeling, and Association. Although the terra cotta cornice and window surrounds on the façade remain, they are not sufficient to convey the significance of the building given the overall loss of integrity on the building's interior and exterior.

To address the comments regarding the integrity of the 949 Market Street (the former Empress/St. Francis Theater), and to confirm existing conditions, historic resource consultants Page & Turnbull conducted a site visit on January 25, 2010, to verify the existing exterior conditions and historic integrity of the three subject buildings at 935-965 Market Street (the project site).[45] Page

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[43] Page & Turnbull, *Historic Resources Study: St. Francis Theater, 949-961 Market Street, San Francisco, September 5, 2001*, p. 5.
[44] Ibid, p.46.
[45] Page & Turnbull, *Memorandum: 935-965 Market Street Site Visits (1/25/10 and 2/19/2010)*, March 26, 2010.

& Turnbull conducted another site visit on February 19, 2010 to observe current interior conditions of 949-961 Market Street.[46]

Page and Turnbull summarizes, reiterates, and reconfirms previous conclusions regarding the integrity of 949 Market Street. On the interior, Page and Turnbull reconfirmed that no historic architectural features associated with the St. Francis Theater remain. On the exterior, Page and Turnbull found that while portions of the historic terracotta façade and fenestration remain behind plywood and other insensitive cladding materials, the overall character of the façade has been compromised by insensitive alterations and modernization.

The National Park Service states in regard to an evaluation of integrity that,

> Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.[47]

Regarding non-historic exteriors, the National Park Service further states,

> If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible *if* the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance…If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.[48]

With respect to surviving original features of the façade, Page and Turnbull concludes that "even if some additional historic fabric were to be uncovered on the façade in the future, the documented changes to the building have been so great that a re-evaluation of the building's integrity would not yield different results."[49] The Planning Department reviewed this re-assessment of the integrity of the subject building and concurs with Page & Turnbull's findings.

The NOP/IS also includes a summary of the evaluation regarding the impact of the proposed new construction on the historic visual setting of nearby off-site historic resources. Page and Turnbull concluded and the Planning Department agreed that the proposed project would not materially impact any nearby off-site historic resource. An extensive discussion/analysis regarding impacts

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[46] Ibid.
[47] U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: "How to Apply the National Register Criteria for Evaluation,"* (1990, revised 1997), p. 46.
[48] Ibid, p. 47.
[49] Ibid.

to off-site historic resources is included on pp. 24-41 in the 2007 HRE, which informed the 2007 HRER and is summarized in the NOP/IS. Potential off-site historic resources are addressed under Response 8.6 below.

Comment B-1 suggests that the proposed project be modified to require that the developer preserve the existing street façades and restore them to their original appearance. None of the buildings on the project site including 949 Market Street are historic resources, nor is the project site within an existing or proposed historic district. There is no regulatory or policy requirement that any of the three buildings including 949 Market Street be retained or rehabilitated. Therefore, this change is not required as mitigation under CEQA. *CEQA Guidelines* Section 15126.4 states that "Mitigation measures are not required for effects which are not found to be significant." As a comment on the proposed project itself, it may be considered by the decision makers in their decision to approve, modify or disapprove the proposed project.

To the extent that these comments relate to nearby off-site historical resources, they are addressed in Response 8.6 – Evaluation of Potential Adverse Impacts to Historic Districts and Off-site Historical Resources below. See also Response 8.2 – Consultation Regarding Historic Resources.

8.5 Historic Architectural Significance – 941-945 Market Street

Comments

"3.2 The storefront of the building at 941-945 Market, also proposed for demolition as part of the project, is described in the Downtown Survey as "an excellent example of an Art Deco design." The survey rates the building as "C", having contextual importance, presumably a reference to its facade. The building is also classified as a "Priority I" building (meaning highest priority for preservation) in the UMB survey, and rated "3" out of 5 on the 1976 Citywide Architectural Survey." *(Arthur Levy, Attorney, December 21, 2009) [A-15]*

Response

As discussed above in Response 8.1, an evaluation of 941-945 Market Street was conducted in the 2007 HRER as part of the environmental review process for the proposed project. All seven aspects of integrity were considered. As discussed in the NOP/IS, in Appendix A to the EIR, and the 2007 HRER, 941-945 Market Street no longer retains integrity of design, material, workmanship, setting, feeling, and association due to extensive alteration in the 1930's, and changes in the surrounding neighborhood, although it retains integrity of location. The building retains only its original massing, location, and cornice. The building does not meet the criteria

for eligibility for individual listing in the California Register of Historical Resources applicable to historic architectural resources (i.e., Events, Persons, Architecture).[50]

In addition, the building does not contribute to any existing or potentially-eligible historic district as it is not within the boundaries of any such historic districts. The *Mid-Market Redevelopment Plan EIR* considered whether the Market Street Theater and Loft District or the San Francisco Apartment Hotel District should be expanded to include additional properties. The building at 941-945 Market Street was not found to merit inclusion within these districts or any others in the vicinity. Absent any new information that would change the determination of the *Mid-Market Development Plan EIR*, 941-945 Market Street is not considered a "Historical Resource" for the purposes of CEQA.

Historic resource consultants Page and Turnbull reiterate and reconfirm previous conclusions regarding the integrity of 941-945 Market Street after a recent site visit:[51]

> 941-945 Market Street is a small one-story commercial building originally constructed circa 1909. Subsequently, the building has undergone numerous alterations. The building's cornice is the only evidence of its original Twentieth Century Commercial style design, as the façade currently features non-historic materials such as Roman brick, formstone, plywood, contemporary aluminum storefronts, and metal roll-up doors. Like its neighbor, 941-945 Market Street does not retain integrity because it has been altered such that it is no longer recognizable as an early twentieth century commercial building.

Subsequent alterations to the façade that occurred after the survey photographs on file from 1976 and 1990 were taken have destroyed or removed critical character-defining features of the Art Deco renovation. As such, the Art Deco façade alterations to the 1909 structure no longer retain sufficient integrity to be considered significant in their own right.[52]

The Planning Department Preservation staff has reviewed the re-assessment of the subject building completed by Page & Turnbull and concurs with the findings that the building is not a historic resource.

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[50] Planning Department Preservation staff based its evaluation in the 2007 HRER on site visits by staff and on information located within the Planning Department's files, including previous evaluations, surveys, photographs, and background information provided for the Mid Market Redevelopment Plan EIR; survey evaluations by Anne Bloomfield, conducted July 3, 1990; the 1976 Architectural Survey; and the San Francisco Heritage-Charles Hall Page Survey, conducted July 1, 1977, edited December 29, 2008.

[51] Page & Turnbull, *Memorandum: 935-965 Market Street Site Visits (1/25/10 and 2/19/2010),* March 26, 2010.

[52] San Francisco Planning Department, *Memo from Tim Frye, Preservation Technical Specialist, Re: Historic Resource Status for 943 Market St.*, March 31, 2010. A copy of the document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

8.6 Evaluation of Potential Adverse Impacts to Historic Districts and Off-site Historical Resources

Comments

"The CityPlace project lies in an acutely sensitive zone. The Powell and Market shopping, tourist, and transit center lies within line of sight, half a block to the east. On the west, the project is a few doors down from the National Register Market Street Theater and Loft District. The district includes the landmarked Wilson Building at 973 Market on the same side of the block, and extends west of the project up both sides of Market Street. The Planning Commission and the Board of Supervisors must closely review the impact of this project on this fragile and distinctive environment." *(Arthur Levy, Attorney, December 21, 2009) [A-1]*

"The draft does not discuss or evaluate how the demolition of these buildings and their replacement with a modern shopping center will affect the district's character, which is enriched by several landmark buildings that surround project site." *(Arthur Levy, Attorney, December 21, 2009) [A-3]*

"The DEIR does not discuss the relationship of the existing buildings or the proposed new building to the adjacent Powell and Market hub or the National Register Historic Districts adjacent to the project." *(Arthur Levy, Attorney, December 21, 2009) [A-4]*

"The statement fails to place the project in the context of the historic and visual character of the block in which the project is located. The project is located between the National Register Hale Brothers Department Store [901 Market Street], on the one side, and the locally landmarked Wilson Building [973 Market Street] and the Hale Brothers Building [979 Market], on the other. The project is directly across the street from the locally landmarked Garfield Building [938-942 Market Street], Mechanics Savings Building [948 Market Street], and Warfield Theater [982 Market Street]. Nearby landmarks also include the locally landmarked Flood Building [879-898 Market Street] and the National Register U.S. Mint Building [88 Fifth Street] and Haas Candy Factory [54 Mint Street]." *(Arthur Levy, Attorney, December 21, 2009)[A-8]*

"The statement of environmental characteristics is also deficient in failing to place the buildings proposed to be demolished and the new shopping center in the context of the two adjacent National Register Historic Districts, the Market Street Theatre and Loft District (982-1112 Market, 973-1105 Market, I Jones, and 1-35 Taylor Streets) and the Uptown Tenderloin National Register Historic District (comprising 33 blocks in the north of Market Tenderloin district)." *(Arthur Levy, Attorney, December 21, 2009) [A-9]*

"I found a noticeable absence of discussing the impact on the large number of historic buildings near and far because the entire block in which this project is proposed is primarily [historic] buildings. Across the street and further down going east we have the largest number of historic buildings marking the original meaning of Market Street. And while I am not opposed to find ways to insert something new and alleviate what hasn't happened for many years, I think the EIR needs to go more thoughtfully, analyzing what that means relative to a new building. *(Planning Commissioner Kathrin Moore, public hearing comments, December 10, 2009) [TR/S-3]*

Response

As discussed in Response 8.1, potential project impacts to on-site and off-site historic architectural resources were addressed in the NOP/IS, published October 1, 2008. An extensive discussion/analysis regarding impacts to off-site historic resources is included on pp. 24-41 in the 2007 HRE, which informed the 2007 HRER and the NOP/IS. The NOP/IS adequately examines the impact of the proposed new construction on the historic setting of nearby off-site historic resources (see NOP/IS pp. 40-41 for a list of the historic resources and a discussion of potential impacts). The conclusions of the NOP/IS are based upon the 2007 HRER and the 2007 HRE which specifically addressed the potential project impacts to off-site historic resources in the project vicinity. Although the project site is not within any historic district, the NOP/IS identifies several nearby existing and potential historic districts as well as several nearby individual buildings that are considered historic resources.

CEQA Guidelines Section 15064.5 defines a project that would have a significant adverse impact on an historical resource as one that "Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register for Historical Resources."

The NOP/IS (p. 41) describes how the proposed building would appear within the neighboring context and concludes that the proposed project would not have a significant impact on offsite historic resources under CEQA for the following reasons.

> The proposed new infill construction would occur in an area of varied visual character outside of any historic district. The five-story height of the proposed project is within the varied range of heights currently found in the project vicinity. The proposed new building would not obscure existing public views of nearby historic buildings, but would frame and direct views along Market Street. The contemporary, transparent design and materials of the proposed project would be differentiated from nearby older buildings, rather than attempt to mimic historic patterns. It would not visually overwhelm nearby historic resources.

In addition, Chapter IV, Section B. Aesthetics, EIR pp. IV.B.1-IV.B.14, describes the varied yet cohesive visual setting of the Market Street corridor in the vicinity of the project site, comprised of many buildings designed in historically-derived revival styles of the early 20th century. That EIR section also identifies several nearby visually distinguished historic resources that were considered scenic resources for the purposes of the EIR's visual quality analysis. On p. IV.B.13, the EIR concludes:

> Although the proposed new building would be a prominent new presence along Market Street, the visual changes under the proposed project would not be considered to substantially degrade the existing visual character or quality of the site and its surroundings in the developed urban context of the proposed project.

> The proposed new building would be placed within a pre-existing, visually varied, and densely developed urban context, and it would be compatible with the scale and character of existing buildings in the vicinity of the project site. For these reasons, the proposed project would not have a significant environmental impact on visual quality under CEQA.

The comments on the EIR present no substantial evidence that the proposed project would cause a significant adverse impact on any nearby off-site historical resource that would change the conclusions presented in the EIR or NOP/IS.

D. DRAFT EIR TEXT CHANGES

This section presents text changes for the *935-965 Market Street Project CityPlace Draft Environmental Impact Report*. The Draft EIR text changes reflect changes developed in response to comments and staff-initiated text changes to clarify information. The revisions are organized by EIR section and, as in the responses in this Comments and Responses document, deleted text is struck ~~through~~ and new text is underlined. The text additions and revisions presented below clarify and expand on the information presented in the Draft EIR. The revised text does not provide new information that identifies new significant environmental impacts; the clarified and expanded information does not identify mitigation measures that, if implemented, would result in significant environmental impacts; and considerably different alternatives and/or mitigation measures were not identified that would clearly lessen the significant environmental impacts of the proposed project.

SUMMARY

On EIR p. S.2 the second to last sentence of the first paragraph (continued from EIR p. S.1) has been revised to reflect the reconfiguration of floor B2 to provide a will call area for the pick-up of bulky items.

> There would be ~~201~~ 188 parking spaces, ~~21~~ 23 bicycle parking spaces, and four loading spaces.

Table S.3: Comparison of Impacts of the Proposed Project to Alternatives B and C on EIR pp. S.15 - S.16 has been revised to reflect the reconfiguration of floor B2 and to include information on the impacts of the Reduce Parking Variant.

Table S.3: Comparison of Impacts of the Proposed Project to Alternatives B, ~~and~~ C.1, and C.2 (Revised)

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
Impacts				
Land Use	No significant effects	No significant effects	No significant effects	No significant effects
Aesthetics	No significant effects	No significant effects	No significant effects	No significant effects

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
Cultural and Paleontological Resources	Cul-1: Soils disturbance onsite as a result of the project may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.	Cul-1: Soils disturbance onsite as a result of the alternative may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.	Cul-1: Soils disturbance onsite as a result of the alternative may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.	Cul-1: Soils disturbance onsite as a result of the alternative may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.
Transportation and Circulation	TR-1: Deterioration in the Level of Service at the Fifth Street/Stevenson Street intersection from LOS D to LOS E. Mitigation is considered infeasible.	No significant effect at the Fifth Street / Stevenson Street intersection.	No significant effect at the Fifth Street / Stevenson Street intersection.	No significant effect at the Fifth Street / Stevenson Street intersection.
	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street /Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street /Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.
	TR-3: Considerable contribution to a significant cumulative traffic impact at the Fifth Street/Stevenson Street intersection. Mitigation is considered infeasible.	No contribution to significant cumulative impact at the Fifth Street/Stevenson Street intersection.	No contribution to significant cumulative impact at the Fifth Street / Stevenson Street intersection.	TR-3: Considerable contribution to a significant cumulative traffic impact at the Fifth Street/Stevenson Street intersection. Mitigation is considered infeasible.

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street/Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street /Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	No considerable contribution to significant cumulative traffic impact at the Fifth Street / Mission Street intersection.	No considerable contribution to significant cumulative traffic impact at the Fifth Street / Mission Street intersection.
	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	Considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection. No feasible mitigation identified.	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.
Noise	No significant effects	No significant effects	No significant effects	No significant effects
Air Quality[a]	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.
	AQ-3: Construction of the proposed project would result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
Hazards and Hazardous Material	Haz-1: Construction of the project would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.	Haz-1: Construction of the alternative would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.	Haz-1: Construction of the alternative would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.	Haz-1: Construction of the alternative would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.

Note:
[a] The significant Air Quality impacts identified here would occur if the significance thresholds in the current BAAQMD *CEQA Guidelines Update* are adopted. Under the significance thresholds currently utilized by the City of San Francisco, neither the proposed project nor the alternatives would result in a significant air quality impact.

On EIR p. S.16 the beginning of the first paragraph has been revised as follows:

> Similar to the proposed project, development of the Reduced Intensity Alternative would not result in significant land use or aesthetic impacts. Demolition of the existing buildings onsite and construction of this alternative would result in less excavation than the proposed project, but one level below grade would still be constructed. Therefore, Mitigation Measures Cul-1 and Haz-1 would still be required to reduce potential archeological resource impacts and hazards impacts to less than significant. This alternative would result in fewer transportation-related impacts compared to the proposed project primarily because of the reduction in trip generation.

On EIR p. S.16, the heading **C. NO GARAGE ALTERNATIVE** is revised to read:

C.1: NO GARAGE ALTERNATIVE

On EIR p. S.17 the beginning of the first paragraph has been revised as follows:

> Similar to the proposed project, development of the No Garage Alternative would not result in significant land use or aesthetic impacts. Demolition of the existing buildings onsite and construction of this alternative would result in less excavation than the proposed project, but there would still be one below grade level. Therefore, Mitigation Measures Cul-1 and Haz-1 would be required to reduce potential archeological resource and hazards impacts to less than significant. This alternative would result in fewer transportation impacts compared to the proposed project with parking.

A summary of the Reduced Parking Variant to the No Garage Alternative is added after C.1: No Garage Alternative on EIR p. S.17.

C.2 REDUCED PARKING VARIANT OF THE NO GARAGE ALTERNATIVE

Similar to the No Garage Alternative and the proposed project the Reduced Parking Variant of the No Garage Alternative (Reduced Parking Variant) would provide the same amount of retail space, the same number of loading spaces and bicycle parking spaces, and would have the same building height and massing. The project approvals needed for this alternative would be similar to those needed for the proposed project; however, the purchase of TDRs would be slightly modified because there would be less non-accessory parking gross square feet as a result of the removal of one level of parking.

Similar to the No Garage Alternative and the proposed project, the Reduced Parking Variant would not have impacts on land use or aesthetics. Demolition of the existing buildings onsite and construction of this alternative would result in less excavation than the proposed project, but more excavation than the No Garage Alternative. There would still be two below grade levels - one for retail and one for parking. Therefore, Mitigation Measures Cul-1 and Haz-1 would be required to reduce potential archeological resource and hazards impacts to less than significant. The traffic generated under the Reduced Parking Variant would not result in any significant project-related transportation impacts under Existing Conditions plus the Reduced Parking Variant; however, under the 2030 Cumulative Conditions plus the Reduced Parking Variant, a significant cumulative impact would occur at the Fifth Street/Stevenson Street intersection. Traffic-related operational impacts on regional air quality would be similar to those with the proposed project and the No Garage Alternative. Noise and traffic-related operational impacts on regional air quality, which were determined to be less than significant under both the proposed project and the No Garage Alternative, would also be less-than-significant under this variant. Similar to the No Garage Alternative and the proposed project, there are no significant impacts on transit, pedestrians, bicyclists, loading, or parking under the Reduced Parking Variant.

The third and fourth full paragraphs on EIR p. S.17, under the heading Environmentally Superior Alternative, have been revised to include text on the Reduce Parking Variant.

The selection of the environmentally superior alternative is based upon the evaluation of impacts in Chapter VI, Alternatives, and summarized in this section. There would be a greater amount of excavation and soils disturbance with the ~~Reduced Intensity Alternative~~ Reduced Parking Variant of the No Garage Alternative than with either the Reduced Intensity Alternative or the No Garage Alternative, which may lengthen the disruption in the project vicinity with the Reduced Parking Variant ~~Reduced Intensity Alternative~~.

~~Both t~~The Reduced Intensity Alternative, ~~and~~ the No Garage Alternative, and its Reduced Parking Variant would result in fewer transportation-related impacts than the proposed project. However, the effects of transportation-related impacts for the No Garage Alternative and its Reduced Parking Variant with respect to

pedestrians, transit and traffic would be less than with the Reduced Intensity Alternative. With one level of parking available, both ~~T~~the Reduced Intensity Alternative and the Reduced Parking Variant would likely generate greater vehicular traffic on Stevenson Street than the No Garage Alternative, which would increase the potential for conflicts between pedestrians and vehicles. ~~Both~~ The Reduced Intensity Alternative and the No Garage aAlternative and its Reduced Parking Variant would result in a significant cumulative traffic impact at one intersection. The Reduced Intensity Alternative would result in a significant cumulative impact at the intersection of Fifth and Mission Streets. The No Garage Alternative would result in a significant cumulative impact at the intersection of Fourth and Howard Streets. The Reduced Parking Variant of No Garage Alternative would result in a significant cumulative impact at the intersection of Fifth and Stevenson Streets.

Under 2030 Cumulative conditions for the Reduced Parking Variant the intersection of Fifth Street and Stevenson Street would remain at LOS E. ~~However, t~~The magnitude of the deterioration in intersection operations for the 2030 Cumulative conditions would be greater at the intersection of Fifth Street and Mission Street under the Reduced Intensity Alternative than at the intersection of Fourth Street and Howard Street under the No Garage Alternative. In addition, there is greater transit volume moving through the intersection of Fifth Street and Mission Street as well as increased pedestrian activity so the potential for conflicts with transit and pedestrians may also be increased with the Reduced Intensity Alternative when compared to the No Garage Alternative and the Reduced Parking Variant.

In light of these considerations, the No Garage Alternative and its Reduced Parking Variant would be considered ~~the~~ environmentally superior to either the proposed project or the Reduced Intensity Alternative.

CHAPTER II, PROJECT DESCRIPTION

On EIR p. II.4 the first and third sentences in the first paragraph under E. Project Characteristics have been revised to reflect the removal of 12 parking spaces to provide a will call area for the pick- up of bulky items.

The project sponsor proposes to demolish the three existing two- to five-story buildings and redevelop the site with one five-story, approximately 90-foot-tall commercial building, with new retail uses, associated building services, and a below-grade parking garage with ~~201~~ 188 off-street parking spaces.

Building services would occupy a small portion of all above- and below-ground floors; a loading area and a vehicular driveway would be provided on the ground floor; a bulky item pick-up area would provided for customers at floor B2; and a mechanical penthouse, including rooftop equipment, would be located on the roof above the fifth floor.

On EIR p. II.5 Table II.1: Summary of Project Characteristics has been revised to reflect the changes to the number of parking spaces provided.

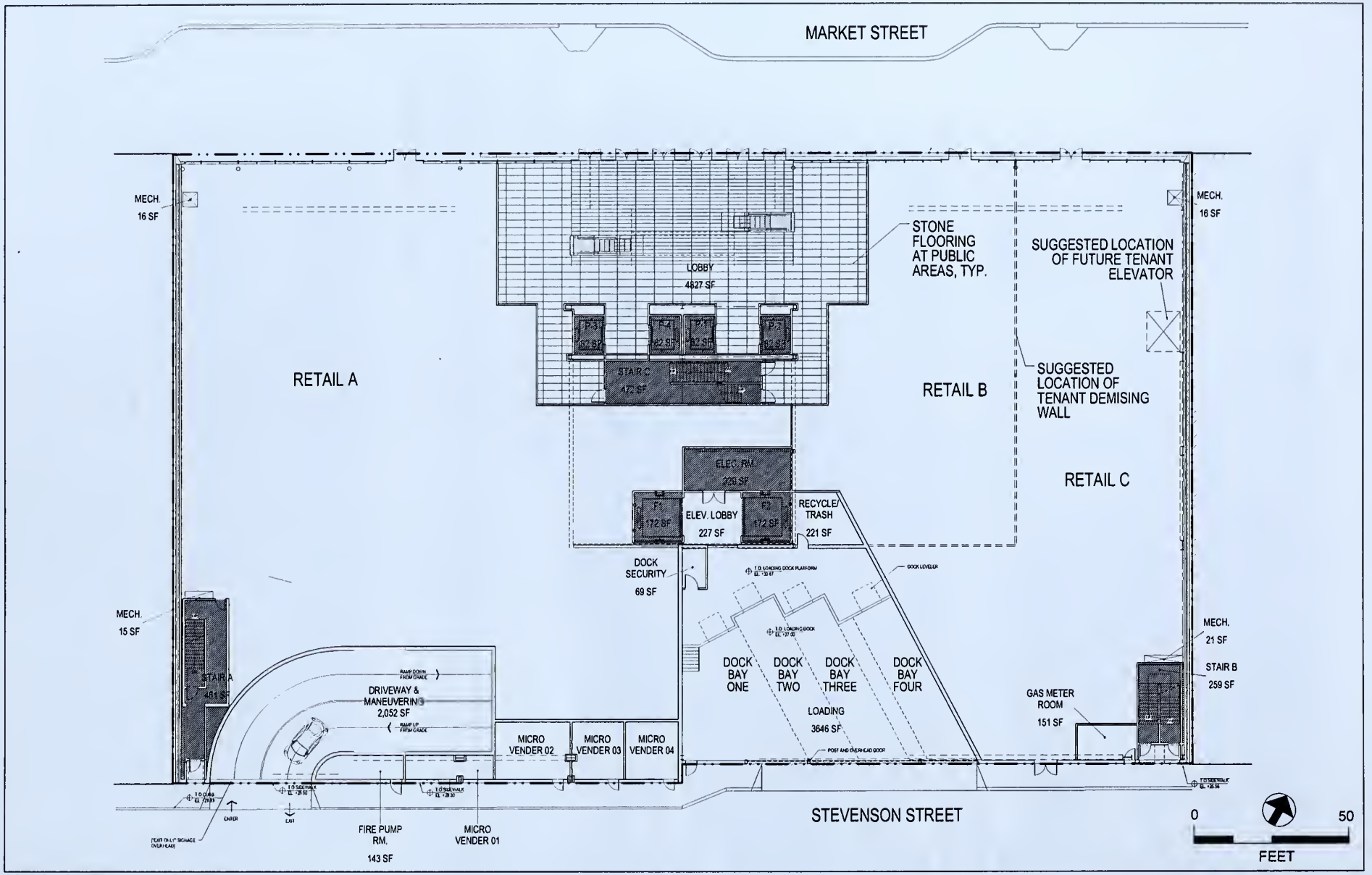
Table II.1: Summary of Project Characteristics (Revised)

Characteristic	Proposed Project
Proposed space (gsf)	
Retail	264,010
Common areas	4,830
Mechanical/Storage	10,900
Parking/Loading/Circulation	95,960
Total	**375,700**
Number of buildings	1
Height / Number of stories	90 feet / 5 stories plus mezzanine[a]
Parking levels	3 subsurface levels[b]
Number of parking spaces	~~201~~ 188[c]
Number of loading spaces	3[d]

Notes:
[a] Does not include 16-foot-tall mechanical penthouse.
[b] Retail uses at first below-grade level; parking and mechanical/storage at second and third below-grade levels.
[c] Independently accessible spaces. With valet parking, the garage would accommodate up to 280 vehicles.
[d] A fourth loading dock would be for garbage handling.

Source: Gensler Architects and Turnstone Consulting

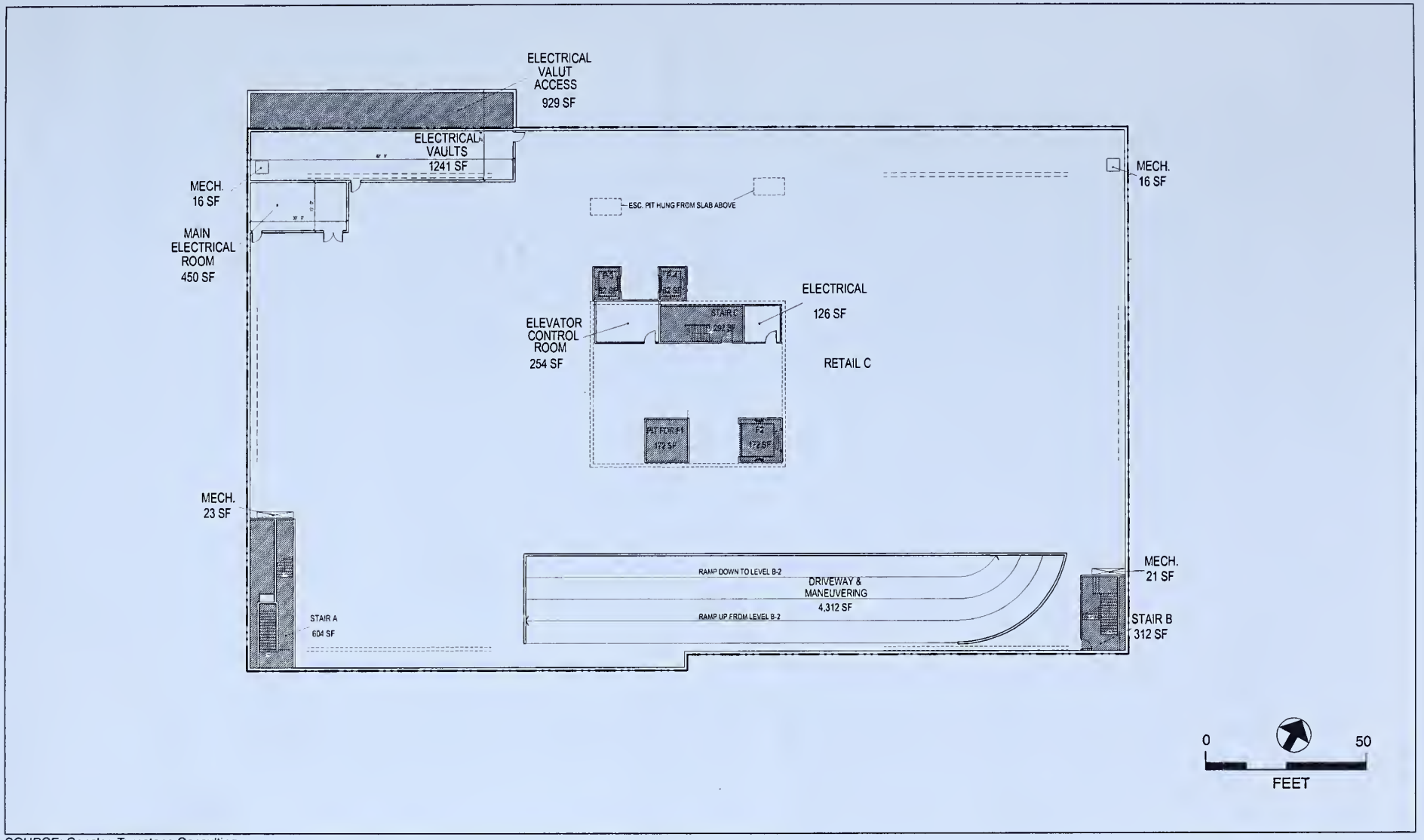
On EIR pp. II.11 and II.14, Figure II.6: Proposed Ground Floor Plan and Figure II.8: Proposed First Basement Floor (B1) Plan have been revised for clarification to show the correct entry/exit sequence from one-way Stevenson Street and the correct parking space orientation at the second basement level. These revised figures are presented below.



SOURCE: Gensler, Turnstone Consulting

CITYPLACE
2005.1074E

FIGURE II.6: PROPOSED GROUND FLOOR PLAN (REVISED)



SOURCE: Gensler, Turnstone Consulting

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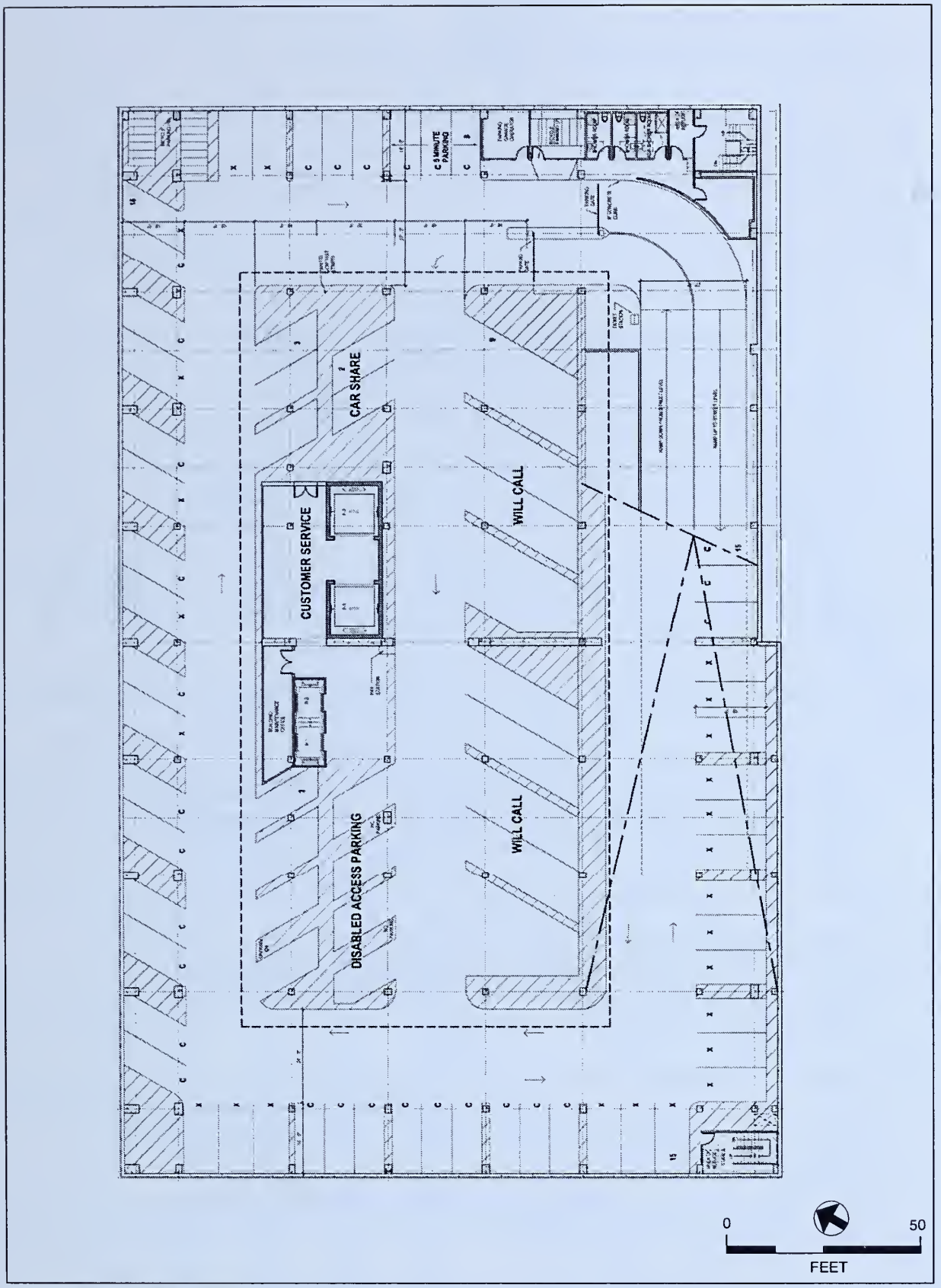
FIGURE II.8: PROPOSED FIRST BASEMENT FLOOR (B1) PLAN (REVISED)

On EIR p. II.16 the second full paragraph has been revised to reflect the reconfiguration of floor B2 to provide a will call area for patrons to pick up bulky items and to add more bicycle parking.

> The parking garage driveway entrance/exit and loading docks would be located at the rear of the building and would be accessible from Stevenson Street. One of the loading docks would be occupied by the building trash collection facility and would be accessible to garbage route trucks. Two of the three subsurface levels (floors B2 and B3) would be occupied by a parking garage. (See Figure II.10: Proposed Second Basement Floor (B2) Plan and Figure II.11: Proposed Third Basement Floor (B3) Plan.) The parking garage would provide approximately ~~201~~ 188 independently accessible retail parking spaces; with valet parking, the garage would accommodate up to approximately 240-280 vehicles. At floor B2 approximately 9 will call spaces would be reserved for bulky item pick. ~~Four~~ In this same area, five parking spaces ~~are~~ would be reserved for exclusive use as car-sharing parking spaces. The proposed parking garage ~~will~~ would not be free of charge to the public. The garage ~~will~~ would require patrons to pay for parking subject to the rate structure required by *Planning Code* §155(g). A minimum of ~~21~~ 23 secure bicycle parking spaces (~~10~~ 12 more than required by the *Planning Code*) would be provided on floor B2. Shower and locker facilities for bicyclists ~~are~~ would be provided on floor B2. There would also be a small office for parking garage staff at this level. A portion of floor B3 (approximately 6,315 sq. ft.) would remain unexcavated.

On EIR p. II.17, Figure II.10: Proposed Second Basement Floor (B2) Plan (Revised) has been revised for clarification to show the correct entry/exit sequence from one-way Stevenson Street, the correct parking space orientation at the second basement level, and the correct representation of the will call area for customer pick-up. This revised figure is presented below.



SOURCE: Gensler, Turnstone Consulting

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FIGURE II.10: PROPOSED SECOND BASEMENT FLOOR (B2) PLAN (REVISED)

SECTION IV.C, TRANSPORTATION AND CIRCULATION

As a result of public comments received, a *Supplemental Transportation Analysis* was conducted to understand whether or not a broader area would be affected by the proposed project and its alternatives. The results of the *Supplemental Transportation Analysis* are presented below as Draft EIR text changes. No new significant transportation impacts were identified as a result of the larger study area. All new and revised text is shown as underlined text and deleted text is shown in ~~strikethrough~~. The first paragraph on EIR p. IV.C.1 is revised to read:

> This section summarizes and incorporates the results of a transportation impact analysis (TIA) prepared by an independent transportation consultant for the proposed retail development at 935-965 Market Street.[1] The TIA describes existing and future (2030) transportation conditions (roadway traffic, transit, pedestrian, bicycle, parking, and loading) in the vicinity of the ~~proposed~~ project site and evaluates its environmental effects. A supplemental transportation study was conducted as a result of Comments on the Draft EIR, and the results are incorporated below.[2]
>
> [1] The information in this section is from the *935-965 Market Street Transportation Study – Final Report*, October 28, 2009, prepared by AECOM (hereafter *Transportation Study*). This report is on file and available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, in Case File Number 2005.1074E.

A new footnote is added on EIR p. IV.C.1 to reference the *Supplemental Transportation Analysis*. Footnote numbers in Section IV.C have been revised to account for the insertion.

> [2] AECOM, May 5, 2010, *CityPlace Transportation Study - Results of Supplemental Traffic and Pedestrian Analysis* (hereafter *Supplemental Transportation Analysis*). This report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

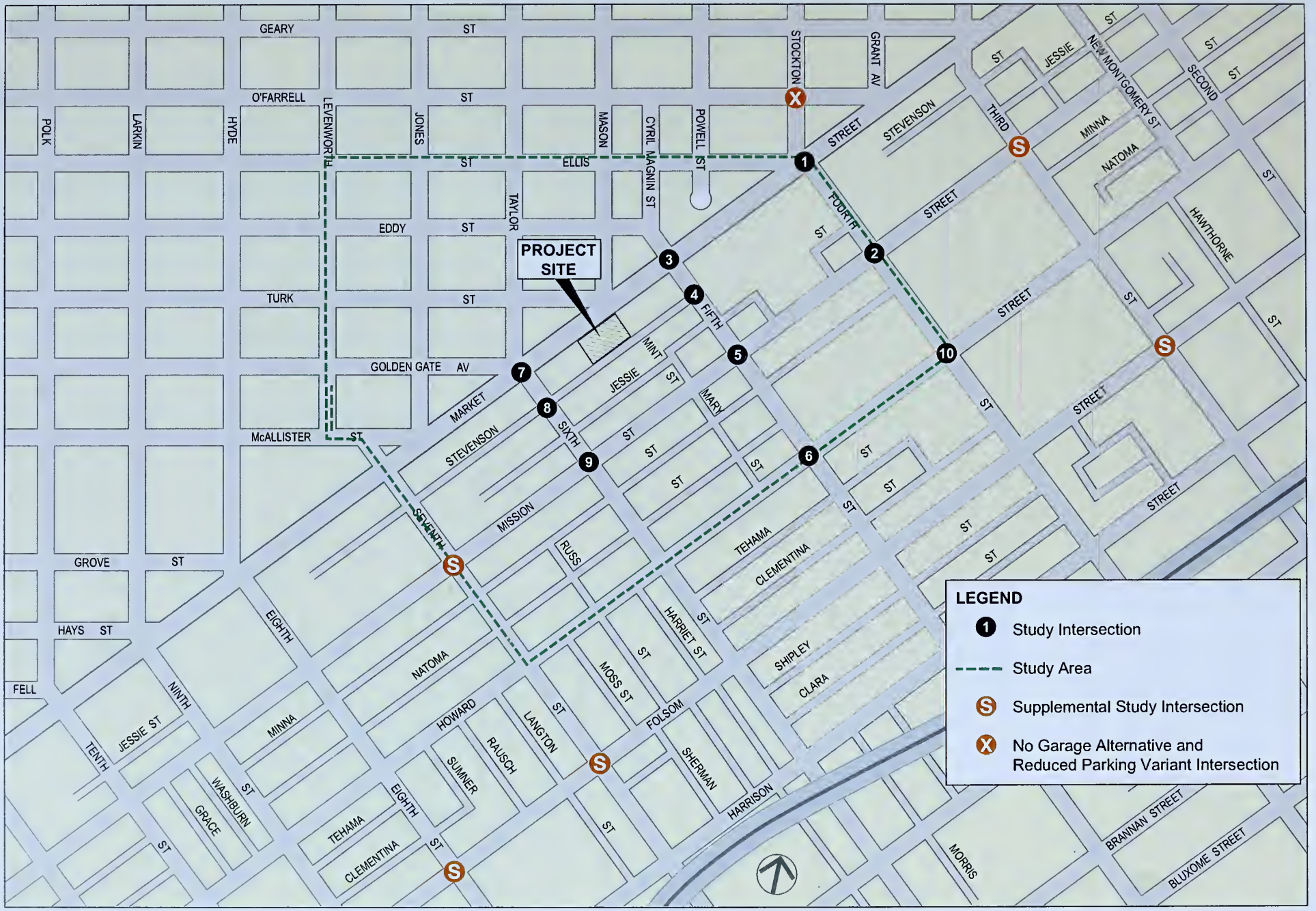
The first sentence in the second paragraph on EIR p. IV.C.1 is revised to read:

> The TIA established a study area around the project site for traffic, transit, and parking analyses which was expanded in response to comments as described above (see Figure IV.C.1: Expanded Transportation Study Area and Intersection Analysis Locations (Revised)).

The following text is added after the second paragraph on EIR p. IV.C.1:

> Figure IV.C.1: Expanded Transportation Study Area and Intersection Analysis Locations (Revised) shows the expanded transportation study area. The supplemental study intersections are Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street.

Figure IV.C.1: Transportation Study Area and Intersection Analysis Locations, on EIR p. IV.C.2, has been revised to include the supplemental study intersections. The revised figure is shown on the next page.



SOURCE: AECOM

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FIGURE IV.C.1: EXPANDED TRANSPORTATION STUDY AREA AND INTERSECTION ANALYSIS LOCATIONS (REVISED)

The following text is added after the first paragraph on EIR p. IV.C.6:

> Existing conditions for the supplemental study intersections are presented in revised Table IV.C.1.

Table IV.C.1: Intersection LOS – Existing Conditions on EIR p. IV.C.6 is revised to add the five supplemental study intersections.

Table IV.C.1: Intersection LOS – Existing Conditions[a] (Revised)

Intersection	Traffic Control	Existing Conditions	
		LOS	Delay
1. Fourth Street/Market Street	Signalized	**F**	**>80.0**
With Transit Lane Enforcement		***F***	***>80.0***
2. Fourth Street/Mission Street	Signalized	C	28.7
With Transit Lane Enforcement		*D*	*39.1*
3. Fifth Street/Market Street	Signalized	C	27.0
With Transit Lane Enforcement		*C*	*28.2*
4. Fifth Street/Stevenson Street	One-Way Stop-Controlled	D	27.6
5. Fifth Street/Mission Street[b]	Signalized	C	29.5
With Transit Lane Enforcement		*C*	*31.8*
6. Fifth Street/Howard Street	Signalized	C	22.3
7. Sixth Street/Market Street	Signalized	C	29.1
With Transit Lane Enforcement		*C*	*31.0*
8. Sixth Street/Stevenson Street	One-Way Stop-Controlled	C	21.9
9. Sixth Street/Mission Street	Signalized	D	36.7
With Transit Lane Enforcement		*D*	*40.8*
10. Fourth Street/Howard Street	Signalized	D	38.8
Third Street/Mission Street	Signalized	C	22.8
With Transit Lane Enforcement		*D*	*52.0*
Third Street/Folsom Street	Signalized	D	46.1
Seventh Street/Mission Street	Signalized	C	27.5
With Transit Lane Enforcement		*D*	*46.8*
Seventh Street/Folsom Street	Signalized	C	28.7
Eighth Street/Folsom Street	Signalized	C	23.6

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] During field observations, queues formed at each of the study intersections and the Market and Mission Street transit-only lanes were used primarily by transit vehicles with occasional encroachment by other vehicles.

[b] The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At the time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the San Francisco Bicycle Plan EIR.

Source: AECOM, October 2009 and May 2010

The third sentence of the third full paragraph on EIR p. IV.C.7 is revised to read:

> MUNI operates ~~31~~ 30 transit lines in the vicinity of the project site.

Figure IV.C.2: Nearby Transit Service, on EIR p. IV.C.8, is revised to reflect the elimination of the 26-Valencia route; the elimination of the 7-Haight route; the addition of the 9L-San Bruno; changes to the Bayshore Express Route Numbers from 9X, 9AX, and 9BX to 8X, 8AX, and 8BX; and the consolidation of the 16AX- and 16BX-Noriega Express Routes to 16X. The revised figure is shown on the next page.

The second, third, and fourth full paragraphs on EIR p. IV.C.9 are revised to read:

> The ~~**9X/9AX/9BX**~~**8X/8AX/8BX-Bayshore Expresses** routes operate on Third and Fourth Streets in the vicinity of the project site and provide service between northeast and southeast San Francisco via downtown. ~~To shorten wait times and reduce crowding, the TEP recommends more frequent service on this route.~~ As part of the transit service changes implemented on December 5, 2009, the Bayshore Express routes operate with increased frequency during the peak periods.
>
> The **30-Stockton** and **45-Union/Stockton** operate on Third and Fourth Streets in the vicinity of the project site and provide service to Mission Bay, Downtown, Chinatown, North Beach, the Marina District and Pacific Heights. The 45-Union/Stockton provides additional service to northwest San Francisco at its outer terminal adjacent to The Presidio. ~~To reduce crowding and improve reliability, the TEP recommends that all daytime service on Stockton Street be provided by articulated buses.~~ As part of the transit service changes implemented on December 5, 2009, the 30-Stockton and 45-Union/Stockton have reduced service hours, i.e. a later first bus and an earlier last bus.
>
> The **5-Fulton**, **21-Hayes**, **31-Balboa**, **38-Geary**, and **38L-Geary Limited** provide service between downtown (the Ferry Building or Transbay Terminal) and the Richmond District. ~~The TEP recommends increased service frequency in the peak load direction during the AM and PM peak periods for the 5-Fulton, the 21-Hayes, and the 38L-Geary Limited. The TEP also recommends limited stop service operation of the 5-Fulton route.~~ As part of the transit service changes implemented on December 5, 2009, peak period service frequency has increased and evening service hours have been extended for the 5-Fulton and the 38L-Geary Limited; service hours have been reduced for the 21-Hayes; and peak period service frequencies have decreased and evening service hours have been reduced for the 31-Balboa.

Table IV.C.2: Nearby San Francisco Municipal Railway Service on EIR p. IV.C.10 is revised to reflect the elimination of the 26-Valencia route; the elimination of the 7-Haight route; the addition of the 9L-San Bruno; changes to the Bayshore Express Route Numbers from 9X, 9AX, and 9BX routes to 8X, 8AX, and 8BX; the consolidation of the 16AX and 16BX-Noriega Express Routes to the 16X; and changes to service frequencies.

SOURCE: AECOM

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FIGURE IV.C.2: NEARBY TRANSIT SERVICE (REVISED)

Table IV.C.2: Nearby San Francisco Municipal Railway Service (Revised)

Route	Service Frequency (min.)			Nearest Stop Location (inbound, outbound)
	AM	Midday	PM	
F-Market & Wharves	~~6~~7	8	7	Fifth/Market, Sixth/Market
J-Church	~~9~~8	10	~~9~~8	Powell Station
K-Ingleside	9	~~10~~9	9	Powell Station
L-Taraval	~~7~~8	~~10~~9	~~7~~8	Powell Station
M-Ocean View	9	10	~~9~~10	Powell Station
N-Judah	~~7~~9	10	~~7~~9	Powell Station
S-Castro Shuttle	8	--	10	Powell Station
T-Third Street	9	10	~~10~~9	Powell Station
5-Fulton	~~6~~5	~~8~~7	5	Mason/Market
6-Parnassus	~~10~~9	12	~~10~~9	Mason/Market, Sixth/Market
~~7-Haight~~	~~15~~	-	~~15~~	~~Fifth/Market, Sixth/Market~~
9-San Bruno	10	10	~~8~~10	Fifth/Market, Sixth/Market
9L-San Bruno	10	10	10	Fifth/Market, Sixth/Market
~~9~~8X-Bayshore Express	~~10~~7	~~10~~9	~~10~~8	Third/Market, Fourth/Market
~~9~~8AX-Bayshore A Express	~~10~~7	--	~~10~~7	Third/Market, Fourth/Market
~~9~~8BX-Bayshore B Express	~~10~~7	--	~~10~~7	Third/Market, Fourth/Market
14-Mission	6	8	6	Fifth/Mission
14L-Mission Limited	~~1~~10	~~20~~10	~~1~~10	Fifth/Mission
14X-Mission Express	~~10~~7	--	~~10~~7	Fifth/Mission
16~~A~~AX-Noriega ~~A~~ Express	~~9~~7	--	~~12~~7	Mason/Market, Fifth/Market
~~16BX-Noriega B Express~~	~~10~~	--	~~12~~	~~Mason/Market, Fifth/Market~~
21-Hayes	~~7~~8	12	~~7~~8	Fifth/Market, Mason/Market
~~26-Valencia~~	~~20~~	~~20~~	~~20~~	~~Fifth/Mission~~
27-Bryant	12	12	12	Fifth/Market
30-Stockton	~~5~~9	~~5~~4	~~5~~4	Third/Market, Fourth/Market
31-Balboa	~~10~~12	15	~~10~~12	Fifth/Market, Powell/Market
38-Geary	~~8~~6	~~8~~7	6	Powell/O'Farrell, Powell/Geary
38L-Geary Limited	~~7~~6	~~7~~6	~~7~~6	Powell/O'Farrell, Powell/Geary
45-Union/Stockton	9	9	9	Third/Market, Fourth/Market
71-Haight/Noriega	~~10~~8	12	~~10~~--	Fifth/Market, Sixth/Market
71L-Haight/Noriega Ltd.	~~10~~8	-	~~10~~9	Fifth/Market, Sixth/Market
Powell-Hyde Cable Car	10	8	8	Powell/Market
Powell-Mason Cable Car	10	8	8	Powell/Market

Source: San Francisco Municipal Railway; AECOM, October 2009

The second, third, and fourth full paragraphs on EIR p. IV.C.11 are revised to read:

> The **6-Parnassus**, ~~**7-Haight,** **16AX/16BX-Noriega Expresses**~~ route, and **71/71L-Haight/Noriega** operate on Market Street in the vicinity of the project site and provide service between downtown and Haight-Ashbury and the Sunset

District. ~~The TEP recommends that the 7-Haight route be replaced by the 6-Parnassus and the 71/71L-Haight/Noriega Local/Limited routes. In addition, a reduction in service frequency for the AM peak period and increase in service frequency in the PM peak period for the 16AX-Noriega Express is recommended.~~ As part of the transit service changes implemented on December 5, 2009, peak period service frequency has increased and evening service hours have been reduced for the 6-Parnassus; the 7-Haight route has been eliminated; the 16AX/16BX-Noriega Express routes have been consolidated as the 16X-Noriega Express with more frequent service in the AM peak period; service hours have been reduced for the 71-Haight/Noriega; and peak period service frequency has increased for the 71L-Haight/Noriega.

Southeast Routes

The **9-San Bruno** and ~~**9X/9AX/9BX**~~**8X/8AX/8BX-Bayshore Expresses** routes provide service between downtown and the southeastern neighborhoods of San Francisco. The 9-San Bruno operates on Market Street in the vicinity of the project site and provides service between the Ferry Terminal and Visitacion Valley. The ~~9X/9AX/9BX~~8X/8AX/8BX-Bayshore Expresses routes operate on Third and Fourth Streets in the vicinity of the project site and provide service between northeast San Francisco and Portola, Visitacion Valley, the Balboa Park Station, and City College. ~~The TEP recommends more frequent service for the express lines to shorten wait times and reduce crowding.~~ As part of the transit service changes implemented on December 5, 2009, a new limited service route has been introduced – the 9L-San Bruno – and the Bayshore Express routes operate with increased frequency during the peak periods.

The **14-Mission, 14L-Mission Limited, 14X-Mission Express, ~~26-Valencia,~~** and **27-Bryant** provide service between downtown and the Inner and Outer Mission. The 14-Mission operates on Mission Street in the vicinity of the project site and provides service between the Ferry Terminal and Daly City. In addition to the local serving routes, limited and express service is provided on the 14L and 14X lines. ~~The 26-Valencia provides service between downtown and the Balboa Park Station.~~ The 27-Bryant provides service between Nob Hill and the Mission. The TEP recommends increased service frequency in the peak load direction during the AM and PM peak periods for the Mission Corridor bus routes including additional peak period service with longer service times for the 14-L route and increased service frequency for the 14-X route. Under the TEP recommendations, the 26-Valencia route is proposed to be eliminated and the 27-Bryant will increase service frequency in the peak load direction during the AM and PM peak periods. As part of the transit service changes implemented on December 5, 2009, the 14L-Mission Limited has expanded its hours of operation and service frequency; peak period service frequency has increased for the 14X-Mission Express; the 26-Valencia route has been eliminated; and the 27-Bryant route has reduced evening service hours.

Text is added to the end of the second full paragraph on EIR p. IV.C.14 to add information regarding the methodology used for the supplemental quantitative pedestrian analysis included in the *Supplemental Transportation Analysis*.

In addition, pedestrian counts also were conducted in January 2010 for the supplemental quantitative pedestrian impact analysis.

Text is added to the beginning of the fourth full paragraph starting on EIR p. IV.C.14 to revise the description of existing sidewalk conditions.

Between Market Street and Mission Street, the Fifth Street sidewalks are 15 feet wide. Beginning at Mission Street and continuing south, the Fifth Street sidewalks are 10 feet wide. Along ~~Fifth and~~ Sixth Streets ~~the~~ sidewalks are approximately 10 feet wide on the project block. The sidewalks on Fifth and Sixth Streets ~~and~~ exhibit moderate pedestrian volumes and~~. Sidewalks on Fifth and Sixth Streets~~ operate at free-flow conditions with pedestrians moving at normal walking speeds with freedom to bypass other pedestrians.

Table IV.C.7: Intersection LOS – Existing Plus Project Conditions on EIR p. IV.C.27 is revised to add the five supplemental study intersections.

Table IV.C.7: Intersection LOS – Existing Plus Project Conditions (Revised)

	Intersection	Existing Conditions		Existing Plus Project		Impact Y/N
		LOS	Delay	LOS	Delay	
1.	Fourth Street/Market Street	**F**	**>80.0**	F	**>80.0**	N
	With Transit Lane Enforcement	*F*	*>80.0*	*F*	*>80.0*	
2.	Fourth Street/Mission Street	C	28.7	C	29.0	N
	With Transit Lane Enforcement	*D*	*39.1*	*D*	*39.7*	
3.	Fifth Street/Market Street	C	27.0	C	28.6	N
	With Transit Lane Enforcement	*C*	*28.2*	*C*	*30.1*	
4.	Fifth Street/Stevenson Street[a]	D	27.6	**E**	**44.1**	**Y**
5.	Fifth Street/Mission Street	C	29.5	D	40.9	N
	With Transit Lane Enforcement	*C*	*31.8*	*D*	*43.5*	
6.	Fifth Street/Howard Street	C	22.3	C	25.2	N
7.	Sixth Street/Market Street	C	29.1	C	30.2	N
	With Transit Lane Enforcement	*C*	*31.0*	*C*	*32.2*	
8.	Sixth Street/Stevenson Street	C	21.9	C	22.0	N
9.	Sixth Street/Mission Street	D	36.7	D	39.1	N
	With Transit Lane Enforcement	*D*	*40.8*	*D*	*42.9*	
10.	Fourth Street/Howard Street	D	38.8	D	39.4	N
	Third Street/Mission Street	C	22.8	C	23.0	N
	With Transit Lane Enforcement	*D*	*52.0*	*D*	*52.8*	
	Third Street/Folsom Street	D	46.1	D	49.2	N
	Seventh Street/Mission Street	C	27.5	C	28.1	N
	With Transit Lane Enforcement	*D*	*46.8*	*D*	*47.4*	
	Seventh Street/Folsom Street	C	28.7	C	29.7	N
	Eighth Street/Folsom Street	C	23.6	C	25.3	N

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] Stevenson at Fifth Street and Sixth Street were analyzed as unsignalized intersections.

Source: AECOM, October 2009 and May 2010.

Text is added to the first paragraph on EIR p. IV.C.27 to reflect the results of the supplemental transportation impact analysis for the Existing Plus Project conditions:

> The Fourth Street/Market Street intersection is the only intersection that operates at LOS F under the Existing Plus Project Conditions scenario (with and without transit lane enforcement). All other intersections <u>including the supplemental study intersections</u> operate at acceptable conditions. Under the Existing Plus Project scenario, all study intersections would continue to operate with acceptable Levels of Service with the exception of the Fourth Street/Market Street (with and without transit lane enforcement) and Fifth Street/Stevenson Street <u>intersections</u>.

As a result of public comments received, additional pedestrian analysis for the proposed project and its alternatives was conducted as part of the *Supplemental Transportation Analysis*. This additional pedestrian analysis provided quantitative analysis to supplement the qualitative analysis provided in the EIR. The analysis includes the crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. The results of the additional analysis conducted for the proposed project are presented below as Draft EIR text changes. No significant pedestrian impacts were identified as a result of the supplemental analysis. All new text is shown as underlined text and existing text that has been deleted is shown in strikethrough.

The second full paragraph on EIR p. IV.C.34 is revised and separated into two paragraphs to reflect the results of the supplemental quantitative pedestrian analysis for the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk. New text with the results of the supplemental quantitative pedestrian analysis is also added after the revised paragraph(s).

> <u>Project-related pedestrian traffic between the project site and the Fifth/Mission Garage would likely increase the number of pedestrians crossing the Fifth Street/Mission Street intersection and adjacent pedestrian facilities.</u> The increased pedestrian volumes at the Fifth Street/Mission Street intersection resulting from project-related parking at the Fifth/Mission Garage would add to the already high volume of people crossing the channelized northbound right turn lane. Because vehicles traveling northbound on Fifth Street yield to pedestrians on the eastbound right turn to Mission Street, a small number of pedestrian/vehicle conflicts were observed at this location under existing conditions. The increased number of project-generated pedestrians queuing at this intersection would result in crowding during peak periods.
>
> <u>The supplemental quantitative pedestrian analysis includes the four crosswalks at the Fifth Street/Mission Street intersection, and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. There would be 173 pedestrian trips assigned to the Fifth Street/Mission Street crosswalks and the Fifth Street sidewalk during the weekday PM peak hour. The pedestrian and vehicular traffic between the project site and the Fifth/Mission Garage would create more congested pedestrian conditions, especially at the crosswalks and the</u>

channelized northbound right-turn movement at the Fifth Street/Mission Street intersection. However, ~~P~~pedestrian/vehicle conflicts would not increase, as cars tend to yield when large numbers of pedestrians move through an intersection. The effect of increased pedestrian volumes crossing the channelized turn lane, therefore, would be a potential reduction to the vehicular capacity of the northbound right-turn movement. The increased use of the Fifth/Mission garage would also add to the volume of people crossing the Mission Street mid-block crosswalk, located between Fourth and Fifth Streets at the garage's mid-block pedestrian entry. However, the project-related increase in pedestrian volumes at this location could be accommodated within the existing free-flow operations. The results of the supplemental quantitative pedestrian analysis are provided below. ~~As a result, the project-generated pedestrians that would travel across the Fifth Street/Mission Street intersection or the Mission Street mid-block crossing would not adversely affect existing pedestrian conditions.~~

Crosswalk Level of Service

To evaluate the pedestrian conditions on the crosswalks at the Fifth Street/Mission Street intersection, a crosswalk LOS was calculated at each of the crossing locations using the Highway Capacity Manual (HCM) methodology. Pedestrian traffic was distributed between the crosswalks as follows: 50 percent of pedestrians destined for the project site were assumed to use the east crosswalk, 25 percent of pedestrians were expected to use the south crosswalk, and 25 percent of pedestrians were expected to use the midblock crosswalk on Mission Street between Fifth Street and Fourth Street. The pedestrians that used the east crosswalk would likely continue north on the east side of Fifth Street. However, about 20 percent of the pedestrians in the east crosswalk were assumed to use the north crosswalk to get to and from the site.

As shown in new Tables IV.C.7a and IV.C.7b, all crosswalks at the Fifth Street/Mission Street intersection operate at acceptable LOS (LOS C or better) under existing conditions. All four crosswalks at the Fifth Street/Mission Street intersection would be expected to continue to operate at acceptable levels (LOS C or better) under the Existing Plus Project Conditions.

The heaviest pedestrian traffic occurring under the proposed project would occur in the east and west crosswalks crossing Mission Street. While some queuing is expected at all crossing locations, there is generally sufficient space at the corners to accommodate pedestrians waiting at the curb. The additional pedestrian traffic between the project site and the Fifth/Mission Garage could result in crowding at the corners during peak hours. Additional crowding at the southeast corner and existing pork-chop island could potentially reduce the vehicular capacity of the channelized northbound right turn lane at the Fifth Street/Mission Street intersection and may also create safety issues during peak periods. However, under the Existing Plus Project Conditions, adequate service levels at all crosswalks would be maintained. Therefore, there would be no significant adverse impacts related to pedestrian activity at the crosswalks.

Table IV.C.7a: Pedestrian Volumes on Mission Street Crosswalks (New)

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B

Source: AECOM, May 2010

Table IV.C.7b: Pedestrian Volumes on Fifth Street Crosswalks (New)

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B

Source: AECOM, May 2010

Sidewalk Level of Service

The sidewalk level of service (LOS) was calculated for the segment of the Fifth Street sidewalk between the Fifth Street/Mission Street and the Fifth Street/Stevenson Street intersections. Under the HCM methodology the sidewalk LOS is determined by taking the effective walkway width[13] at a typical section of sidewalk and identifying the space per pedestrian. This segment of the Fifth Street sidewalk has an effective walkway width of 11 feet. As shown in Table IV.C.7c, this segment currently operates at LOS D and, under the Existing Plus Project Conditions, adequate service levels at all crosswalks would be maintained. Although additional pedestrian traffic could result in more congested conditions on the Fifth Street sidewalk, the sidewalk would continue to operate at acceptable levels (LOS D). Therefore, there would be no significant adverse impacts related to pedestrian activity at the sidewalk.

Table IV.C.7c: Pedestrian Volumes on Fifth Street Sidewalk (New)

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D

Source: AECOM, May 2010

A new footnote has been added on EIR p. IV.C.34 to reference the definition of effective walkway width. Footnote numbers in Section IV.C have been revised to account for the insertion.

[13] Effective walkway width, as defined in the Highway Capacity Manual, is the portion of a walkway that can be used effectively by pedestrians. Effective walkway width is the

total walkway width less the sum of widths and shy distances from obstructions on the walkway.

Text is added after the fourth full paragraph on EIR p. IV.C.38 to provide information on the demand for weekend parking during the holiday season:

Weekend and holiday parking occupancy data from the three closest parking facilities (Fifth/Mission, Ellis/O'Farrell, and Union Square Garages) for the months of November and December in the years 2006 to 2009 was collected and reviewed.[53] The collected data and summary documentation show the parking occupancy percentages and duration of parking at the Fifth/Mission, Ellis/O'Farrell, and Union Square Garages for each day during November and December.[54] This data provides insight on parking demand trends and seasonal peaking characteristics that occur during the holiday period.

The Fifth/Mission, Ellis/O'Farrell, and Union Square Garages, similar to other large parking garages, have an effective capacity of between 90 and 95 percent of capacity; this accounts for the overall inefficiency of finding spaces. Between 2006 and 2009 the Fifth/Mission and Ellis/O'Farrell Garages have operated at near capacity during the holiday season. The Union Square Garage did not operate at over 90 percent of capacity between 2006 and 2008 during the holiday season; however, in 2009, the Union Square Garage did experience occasions when it was at near capacity. On those occasions when the Fifth/Mission and Ellis/O'Farrell Garages were at near capacity, the duration of these periods of maximum occupancy generally lasted from up to an hour to three hours at the Fifth/Mission Garage; from up to an hour to five hours at the Ellis/O'Farrell Garage, extending beyond the typical period of peak parking demand; and from up to an hour to two hours at the Union Square Garage.

Overall parking demand at the Fifth/Mission Garage has decreased over the last two years of this four-year period, with less than half as many days of over 90 percent parking occupancy in 2009 (segments of nine days) as in 2006 or 2007 (segments of 24 days for each year). On a typical day in December 2006, the average daily peak occupancy at the Fifth/Mission Garage was approximately 83 percent. Over the course of the next three years, the average daily peak occupancy decreased to 79 percent in 2007, 73 percent in 2008, and 69 percent in 2009. The overall parking demand at the Ellis/O'Farrell Garage remained steady between 2006 and 2008 with more than half of the November and December calendar days at or above 90 percent parking occupancy (an average of 37 out of 61 possible days) and decreased noticeably in 2009. On a typical day in December 2006, the average daily peak occupancy at the Ellis/O'Farrell Garage was approximately 90 percent. Over the course of the next three years, the average daily peak occupancy decreased to 86 percent in 2007, increased to 94

[53] A *Parking Occupancy Comparison* spreadsheet was prepared by AECOM. This spreadsheet is on file and available for public review at the San Francisco Planning Department, located at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case File 2005.1074E.

[54] Data for the 61 calendar days in November and December was provided for the Fifth/Mission, Ellis/O'Farrell, and Union Square Parking Garages.

> percent in 2008, and decreased to 78 percent in 2009. This general downward trend is likely due to the economic recession. However, these changes do not represent a substantial change in driver behavior when compared to other effects that influence travel demand.

The sixth sentence of the first paragraph on EIR p. IV.C.38 is revised to reflect the reconfiguration of the B2 parking level to provide a will-call area to retail patrons for bulky item pick-up.

> Therefore, the project sponsor intends to seek a Conditional Use authorization to address the provision of ~~201~~ 188 parking spaces.

Text is added to the end of the first paragraph on EIR p. IV.C.38 to reflect the reconfiguration of the B2 parking level to provide a will-call area to retail patrons for bulky item pick-up.

> These spaces would be provided on the B2 level in conjunction with the will-call area for bulky item pick-up provided for the convenience of retail patrons. Nine spaces would be reserved for the will-call area and five spaces would be reserved for car-share vehicles.

The second sentence of the second paragraph on EIR p. IV.C.38 is revised to reflect the reconfiguration of the B2 parking level to provide a will-call area to retail patrons for bulky item pick-up.

> With ~~201~~ 188 parking spaces, the proposed parking supply would not meet the estimated parking demand and would result in a shortfall of approximately ~~279~~ 292 spaces during the weekday midday peak.

The last sentence of the second paragraph on EIR p. IV.C.38 is deleted to reflect the fact that the proposed project's parking shortfall does not include the removal of the on-street parking spaces.

> ~~The loss of 13 on-street parking spaces on Stevenson Street would increase this shortfall to 292 spaces.~~

The *Supplemental Transportation Analysis* included an analysis of the expanded study area for 2030 Cumulative Conditions. As with the supplemental analysis for the Existing Plus Project Conditions, there would be no new significant project-related transportation impacts identified for 2030 Cumulative Conditions as a result of the expanded study area. All new text is shown as underlined text and existing text that has been deleted is shown in strikethrough.

The third sentence in the first paragraph on EIR p. IV.C.45 is revised to reflect the inclusion of the supplemental traffic intersections for 2030 Cumulative Conditions.

> Overall, ~~seven~~ 12 of the ~~10~~ 15 study intersections, including the supplemental study intersections, would operate with unacceptable service levels (LOS E or F) under 2030 Cumulative Conditions during the weekday PM peak hour; therefore there would be significant cumulative traffic impacts in the future.

Table IV.C.8: Intersection LOS – 2030 Cumulative Conditions on EIR p. IV.C.45 is revised add the five supplemental intersections.

Table IV.C.8: Intersection LOS – 2030 Cumulative Conditions (Revised)

Intersection		Existing Conditions		Existing Plus Project Conditions		2030 Cumulative Conditions	
		LOS	Delay	LOS	Delay	LOS	Delay
1.	Fourth Street/Market Street	**F**	**>80.0**	**F**	**>80.0**	**F**	**>80.0**
	With Transit Lane Enforcement	*F*	*>80.0*	*F*	*>80.0*	*F*	*>80.0*
2.	Fourth Street/Mission Street	C	28.7	C	29.0	D	43.0
	With Transit Lane Enforcement	*D*	*39.1*	*D*	*39.7*	*E*	*60.1*
3.	Fifth Street/Market Street	C	27.0	C	28.6	D	53.9
	With Transit Lane Enforcement	*C*	*28.2*	*C*	*30.1*	*E*	*57.8*
4.	Fifth Street/Stevenson Street[a]	D	27.6	**E**	**44.1**	**E**	**49.1**
5.	Fifth Street/Mission Street	C	29.5	D	40.9	**E**	**77.2**
	With Transit Lane Enforcement	*C*	*31.8*	*D*	*43.5*	*E*	*77.9*
6.	Fifth Street/Howard Street	C	22.3	C	25.2	**E**	**77.9**
7.	Sixth Street/Market Street	C	29.1	C	30.2	**E**	**70.3**
	With Transit Lane Enforcement	*C*	*31.0*	*C*	*32.2*	*E*	*77.4*
8.	Sixth Street/Stevenson Street	C	21.9	C	22.0	D	26.8
9.	Sixth Street/Mission Street	D	36.7	D	39.1	**E**	**66.8**
	With Transit Lane Enforcement	*D*	*40.8*	*D*	*42.9*	*F*	*>80.0*
10.	Fourth Street/Howard Street	D	38.8	D	39.4	**E**	**68.2**
	Third Street/Mission Street	C	22.8	C	23.0	**E**	**69.1**
	With Transit Lane Enforcement	*D*	*52.0*	*D*	*52.8*	*F*	*>80.0*
	Third Street/Folsom Street	D	46.1	D	49.2	**F**	**>80.0**
	Seventh Street/Mission Street	C	27.5	C	28.1	**E**	**68.6**
	With Transit Lane Enforcement	*D*	*46.8*	*D*	*47.4*	*F*	*>80.0*
	Seventh Street/Folsom Street	C	28.7	C	29.7	**F**	**>80.0**
	Eighth Street/Folsom Street	C	23.6	C	25.3	**E**	**59.9**

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.

[a] Stevenson Street at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

[b] The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At that time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the San Francisco Bicycle Plan EIR.

Source: AECOM, October 2009 and May 2010.

Text is added to the end of the bulleted list on EIR p. IV.C.46 to reflect the inclusion of the supplemental traffic intersections for 2030 Cumulative Conditions.

- The Third Street/Mission Street intersection would worsen from LOS C to LOS F.
- The Third Street/Folsom Street intersection would worsen from LOS D to LOS F.
- The Seventh Street/Mission Street intersection would worsen from LOS C to LOS E.
- The Seventh Street/Folsom Street intersection would worsen from LOS C to LOS F.
- The Eighth Street/Folsom Street intersection would worsen from LOS C to LOS E.

The first sentence in the first paragraph on EIR p. IV.C.47 is revised to reflect the results of the supplemental traffic analysis for the proposed project for 2030 Cumulative Conditions.

> All ~~seven~~ 13 study intersections would experience increases in cumulative traffic volumes due to anticipated background traffic growth ~~causing the~~ that would result in deterioration of LOS ~~to worsen~~ to LOS E or F under 2030 Cumulative Conditions.

Text is added after the second sentence in the first paragraph on EIR p. IV.C.47 to reflect the results of the supplemental traffic analysis for the proposed project for 2030 Cumulative Conditions.

> At the supplemental intersections, the proposed project would also have a minimal contribution to the growth in traffic volumes from Existing to 2030 Cumulative.

Text is added to the second to last sentence in the first paragraph on EIR p. IV.C.47 to reflect the results of the supplemental traffic analysis for the proposed project for 2030 Cumulative Conditions.

> The proposed project would contribute little or no traffic to the critical movements at the Fourth Street/Market Street, Fifth Street /Howard Street, Sixth Street/Market Street, Sixth Street/Mission Street, and Fourth Street/Howard Street intersections, or at any of the supplemental intersections as presented in Table IV.C.10 (Revised).

Table IV.C.10: Contribution to Critical Movements – 2030 Cumulative Conditions on EIR p. IV.C.48 is revised to add the five supplemental intersections.

Table IV.C.10: Contribution to Critical Movements – 2030 Cumulative Conditions (Revised)

Intersection		Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
1.	Fourth Street/Market Street	SBT	F	0	-	N
		EBT	F	2	0.4	
4.	Fifth Street/Stevenson Street	EBL	F	13	35.1	Y
		EBR	E	135	63.7	
5.	Fifth Street /Mission Street	SBT	F	104	12.5	Y
		EBT	D	0	-	
6.	Fifth Street /Howard Street	NBT	F	0	-	N
		WBT	C	12	0.8	
7.	Sixth Street/Market Street	NBT	F	14	1.0	N
		EBT	D	6	1.5	
9.	Sixth Street/Mission Street	SBT	F	0	-	N
		EBT	D	0	-	

Intersection	Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
10. Fourth Street /Howard Street	SBR WBT	F D	7 12	1.4 0.8	N
Third Street/Mission Street	NBT EBT	F C	5 0	0.3 0.0	N
Third Street/Folsom Street	NBT EBT	F F	0 32	0.0 1.9	N
Seventh Street/Mission Street	NBT EBT	C F	36 0	2.1 0.0	N
Seventh Street/Folsom Street	NBT EBT	F C	0 62	0.0 3.1	N
Eighth Street/Folsom Street	SBT	C	23	1.6	N

Notes:
[a] NBT = Northbound Turn; EBT = Eastbound Turn; EBL = Eastbound Left; EBR = Eastbound Right; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right
Source: AECOM, October 2009 and May 2010.

CHAPTER V, OTHER CEQA CONSIDERATIONS

Text on EIR pp. V.1-V.2 has been revised to correct the percent increase of the City's household growth, replacing "3.1" with the correct "3.7". This correction makes the text consistent with the calculations in footnote 2 on EIR p. V.2. Changes to the last sentence on EIR p. V.1 (which continues onto EIR p. V.2) and the first sentence on EIR p. V.2 are shown below in strikethrough and underline.

> Based on assumptions about commute patterns and household size, the proposed project (with an estimated 750 employees) would generate a potential demand for about ~~295~~ 344 new dwelling units in San Francisco.[33] These new households would represent about ~~3.1~~ 3.7 percent of the City's estimated household growth by the year 2010.

CHAPTER VI, ALTERNATIVES

As previously described, a variant to the No Garage Alternative that would provide one level of below-grade off-street parking has been added to the EIR in Chapter VI, Alternatives. The third paragraph on EIR p. VI.1 is revised to read:

> The following alternatives to the proposed project are discussed and evaluated in this chapter: A. No Project Alternative; B. Reduced Intensity Alternative; and C.1 No Garage Alternative. The No Garage Alternative includes a variant that would provide one level of subsurface parking – the Reduced Parking Variant to the No Garage Alternative (Reduced Parking Variant). The analysis for the Reduced Parking Variant is included as subsection C.2 following the analysis for the No Garage Alternative. Table VI.1 summarizes the significant effects of the

proposed project and Alternatives B, ~~and~~ C.1, and C.2 – the Reduced Parking Variant. The No Project Alternative is not included in this table.

Text has been added to the end of this same paragraph on EIR p. VI.1 to address the feasibility of the reuse of existing buildings and to explain why alternatives with different land uses than the proposed project were not considered.

Alternatives either to reuse the existing structures on the project site or to provide a project with uses other than retail have not been included in the analysis. An alternative that would have reused the existing buildings was determined to be infeasible because it would not meet two primary objectives of the project sponsor: the provision of large floor plates to accommodate "value-based retailers;" and the development of a significant amount of net new retail space (see EIR p. II.1). In order to provide level floor plates across the three existing buildings, the floors of two or all three of the existing buildings would have to be removed and reconstructed to a uniform height. However, two of the existing buildings are one and two stories tall; thus a reuse alternative would not be able to provide the amount or type of retail space proposed by the project sponsor. In addition, the Initial Study concluded that the existing buildings are not considered historic resources for the purposes of CEQA. Thus, a reuse alternative would not result in reductions to or elimination of potentially significant impacts. Residential or office uses were not included as alternatives to be analyzed for the same reasons: these uses would not accommodate "value-based retailers" and would not generate the same amount of retail space as in the proposed project.

Table VI.1: Comparison of Impacts of the proposed project to Alternatives B and C has been revised to reflect the reconfiguration of basement level B2 and to include information on the impacts of the Reduce Parking Variant.

Table VI.1: Comparison of Impacts of the Proposed Project to Alternatives B, ~~and~~ C.1, and C.2 (Revised)

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
Impacts				
Land Use	No significant effects	No significant effects	No significant effects	No significant effects
Aesthetics	No significant effects	No significant effects	No significant effects	No significant effects

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
Cultural and Paleontological Resources	Cul-1: Soils disturbance onsite as a result of the project may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.	Cul-1: Soils disturbance onsite as a result of the alternative may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.	Cul-1: Soils disturbance onsite as a result of the alternative may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.	Cul-1: Soils disturbance onsite as a result of the alternative may impact archeological resources. Mitigation Measure Cul-1 for archeological testing would reduce these impacts to less than significant.
Transportation and Circulation	TR-1: Deterioration in the Level of Service at the Fifth Street/Stevenson Street intersection from LOS D to LOS E. Mitigation is considered infeasible.	No significant effect at the Fifth Street / Stevenson Street intersection.	No significant effect at the Fifth Street / Stevenson Street intersection.	No significant effect at the Fifth Street / Stevenson Street intersection.
	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street/Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street/Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street /Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.	TR-2: Large trucks accessing Stevenson Street would adversely impact operations at the Sixth Street / Stevenson Street and Fifth Street / Stevenson Street intersections. Mitigation identified that would reduce the impact to a less-than-significant level.
	TR-3: Considerable contribution to a significant cumulative traffic impact at the Fifth Street/Stevenson Street intersection. Mitigation is considered infeasible.	No contribution to significant cumulative impact at the Fifth Street/Stevenson Street intersection.	No contribution to significant cumulative impact at the Fifth Street / Stevenson Street intersection.	TR-3: Considerable contribution to a significant cumulative traffic impact at the Fifth Street/Stevenson Street intersection. Mitigation is considered infeasible.

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street/Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	TR-4: Considerable contribution to significant cumulative traffic impact at the Fifth Street /Mission Street intersection. Mitigation identified that would reduce the impact to a less-than-significant level, but the feasibility of this mitigation is uncertain.	No considerable contribution to significant cumulative traffic impact at the Fifth Street / Mission Street intersection.	No considerable contribution to significant cumulative traffic impact at the Fifth Street / Mission Street intersection.
	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.	Considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection. No feasible mitigation identified.	No considerable contribution to the significant cumulative traffic impact at the Fourth Street / Howard Street intersection.
Noise	No significant effects	No significant effects	No significant effects	No significant effects
Air Quality[a]	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.	AQ-2: Construction of the proposed project would result in an exceedance of the proposed update to the BAAQMD significance threshold for emissions of ROGs, from 80 pounds per day to 54 pounds per day.
	AQ-3: Construction of the proposed project would result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.	AQ-3: Construction of the proposed project would likely result in operational-related GHG emissions that exceed the proposed BAAQMD significance threshold of 1,100 metric tons of CO_2E per year.

	Proposed Project	Alternative B: Reduced Intensity Alternative	Alternative C.1: No Garage Alternative	Alternative C.2: Reduced Parking Variant to the No Garage Alternative
Description	264,010 gsf retail uses 90 feet tall 79,850 gsf parking ~~201~~ 188 parking spaces	124,350 gsf retail uses 56 feet tall 39,925 gsf parking 80 parking spaces	264,010 gsf retail uses 90 feet tall no parking	264,010 gsf retail uses 90 feet tall 40,100 gsf parking 80 parking spaces
Hazards and Hazardous Material	Haz-1: Construction of the project would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.	Haz-1: Construction of the alternative would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.	Haz-1: Construction of the alternative would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.	Haz-1: Construction of the alternative would include removal of existing basements and excavation of soil. Implementation of Mitigation Measure Haz-1 would reduce potential impacts due to hazards to less than significant.

Note:
[a] The significant Air Quality impacts identified here would occur if the significance thresholds in the current BAAQMD *CEQA Guidelines Update* are adopted. Under the significance thresholds currently utilized by the City of San Francisco, neither the proposed project nor the alternatives would result in a significant air quality impact.

The following text is added after the Aesthetics paragraph on EIR p. VI.5, to summarize the potential archeological resources impacts for the Reduced Intensity Alternative:

Cultural and Paleontological Resources

Demolition of the three existing buildings onsite and construction of the Reduced Intensity Alternative would result in one level below grade for parking with approximately 80 parking spaces. Although there would be less excavation than for the proposed project, some soils disturbance would result. There could be potential impacts to archeological resources. However, as described in the NOP/IS pp. 42-45, with implementation of Mitigation Measure Cul-1 for archeological testing, potential archeological resource impacts would be reduced to less than significant.

The following text is added after the Air Quality paragraph on EIR p. VI.8, to summarize the potential hazards impacts for the Reduced Intensity Alternative:

Hazards and Hazardous Material

As described above, demolition of the three existing buildings onsite and construction of the Reduced Intensity Alternative would result in one level below grade for parking with approximately 80 parking spaces. Although there would be less excavation than for the proposed project, some soils disturbance would result. There could be potential impacts from contaminated soils. However, as described in the NOP/IS pp. 85-93, with implementation of Mitigation Measure Haz-1 for additional testing and appropriate disposal, potential hazards impacts would be reduced to less than significant.

As a result of public comments received, a *Supplemental Transportation Analysis* was conducted to understand whether or not a broader study area would be affected by the proposed project or its alternatives. The results of the additional analysis conducted for the No Garage Alternative are presented below as Draft EIR text changes. No new significant transportation impacts were identified for the No Garage Alternative as a result of the larger study area. All new text is shown as underlined text and existing text that has been deleted is shown in strikethrough.

On EIR p. VI.8, the heading **C. NO GARAGE ALTERNATIVE** is revised to read:

C.1 NO GARAGE ALTERNATIVE

The following text is added after the Aesthetics paragraph on EIR p. VI.9, to summarize the potential archeological resources impacts for the No Garage Alternative:

Cultural and Paleontological Resources

Demolition of the existing buildings onsite and construction of this alternative would result in less excavation than the proposed project, but there would still be one below grade level for retail and a customer pick up area. Although there would be less excavation than for the proposed project, some soils disturbance would result. There could be potential impacts to archeological resources. However, as described in the NOP/IS pp. 42-45, with implementation of Mitigation Measure Cul-1 for archeological testing, potential archeological resource impacts would be reduced to less than significant.

The last sentence in the third full paragraph on EIR p. VI.10 is revised to reflect the inclusion of the supplemental traffic intersections.

The intersection LOS results for the No Garage Alternative, including those for the supplemental traffic analysis, are summarized in Table VI.3.

The fourth full paragraph on EIR p. VI.10 is revised to reflect the inclusion of the supplemental traffic intersections.

Except for the Fourth Street/Market Street intersection, all study intersections (including the two new locations and the five supplemental intersections) would continue to operate at acceptable conditions (LOS D or better) under the Existing plus No Garage Alternative conditions. Under the Existing Plus No Garage Alternative with transit lane enforcement the LOS at the Seventh Street / Mission Street intersection would degrade to LOS E. However, the City does not consider unacceptable LOS during transit enforcement to be a significant impact in situations where LOS under actual conditions would be acceptable. The significant impact at the Fifth Street/Stevenson Street intersection that would occur under the proposed project would be eliminated under the No Garage Alternative.

Table VI.3: Intersection LOS – Existing plus No Garage Alternative Conditions on EIR p. VI.11 is revised to add the five supplemental intersections.

Table VI.3: Intersection LOS – Existing plus No Garage Alternative Conditions (Revised)

Intersection		Existing Conditions		Existing plus Project Conditions		Existing plus Project– No Garage Alternative Conditions	
		LOS	Delay	LOS	Delay	LOS	Delay
1.	Fourth/Market	**F**	**>80.0**	**F**	**>80.0**	**F**	**>80.0**
	With Enforcement	***F***	***>80.0***	***F***	***>80.0***	***F***	***>80.0***
2.	Fourth/Mission	C	28.7	C	29.0	C	28.9
	With Enforcement	*D*	*39.1*	*D*	*39.7*	*D*	*39.3*
3.	Fifth/Market	C	27.0	C	28.6	C	27.4
	With Enforcement	*C*	*28.2*	*C*	*30.1*	*C*	*28.6*
4.	Fifth/Stevenson[a]	D	27.6	**E**	**44.1**	D	27.3
5.	Fifth/Mission[b]	C	29.5	D	40.9	D	31.0
	With Enforcement	*C*	*31.8*	*D*	*43.5*	*D*	*33.4*
6.	Fifth/Howard	C	22.3	C	25.2	C	26.8
7.	Sixth/Market	C	29.1	C	30.2	C	29.4
	With Enforcement	*C*	*31.0*	*C*	*32.2*	*C*	*31.2*
8.	Sixth/Stevenson[a]	C	21.9	C	22.0	C	22.0
9.	Sixth/Mission	D	36.7	D	39.1	D	39.7
	With Enforcement	*D*	*40.8*	*D*	*42.9*	*D*	*48.3*
10.	Fourth/Howard	D	38.8	D	39.4	D	51.5
11.	Stockton/O'Farrell	C	32.5	C	32.8	C	34.1
	Third/Mission	C	22.8	C	23.0	C	22.9
	With Enforcement	*D*	*52.0*	*D*	*52.8*	*D*	*54.4*
	Third/Folsom	D	46.1	D	49.2	D	48.5
	Seventh/Mission	C	27.5	C	28.1	C	31.6
	With Enforcement	*D*	*46.8*	*D*	*47.4*	***E***	***57.9***
	Seventh/Folsom Street	C	28.7	C	29.7	C	31.5
	Eighth/Folsom	C	23.6	C	25.3	C	25.3

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes.

[a] Stevenson Street at Fifth Street and Sixth Street were analyzed as unsignalized intersections in this scenario.

[b] The San Francisco Bicycle Plan EIR analysis included the southbound left turn movement at this intersection. At the time the analysis was conducted (October 2005) the movement had not been prohibited. For this reason the existing LOS presented here differs from the existing conditions presented in the *San Francisco Bicycle Plan EIR.*

Source: AECOM, October 2009 and May 2010

The first sentence in the second full paragraph on EIR p. VI.12, after the bulleted list, is revised to reflect the change to the number of parking spaces provided under the proposed project.

> Compared to the proposed project, the No Garage Alternative would not increase area-wide parking capacity (construction of the proposed ~~201~~188-space parking garage would increase area-wide parking capacity by 3.5 percent.)

As a result of public comments received, a supplemental quantitative pedestrian analysis was conducted as part of the *Supplemental Transportation Analysis* conducted for the proposed project and its alternatives. The supplemental quantitative pedestrian analysis focused on the crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. The results of this supplemental analysis conducted for the No Garage Alternative are presented below as Draft EIR text changes. No significant pedestrian impacts were identified as a result of the supplemental analysis. All new text is shown as underlined text and existing text that has been deleted is shown in strikethrough.

Text is added after the first paragraph on EIR p. VI.13 to present the results of the supplemental quantitative pedestrian analysis.

> During the weekday PM peak hour 173 project-related pedestrians would travel through the four crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets. The crosswalk and sidewalk level of service evaluation for these locations are presented below.
>
> Crosswalk Level of Service
>
> To evaluate the pedestrian conditions on the crosswalks at the Fifth Street/Mission Street intersection, a crosswalk LOS was calculated at each of the crossing locations using the Highway Capacity Manual (HCM) methodology. Pedestrian traffic was distributed between the crosswalks as follows: 50 percent of pedestrians destined for the project site were assumed to use the east crosswalk, 25 percent of pedestrians were expected to use the south crosswalk, and 25 percent of pedestrians were expected to use the midblock crosswalk on Mission Street between Fifth Street and Fourth Street. The pedestrians that used the east crosswalk would likely continue north on the east side of Fifth Street. However, about 20 percent of the pedestrians in the east crosswalk were assumed to use the north crosswalk to get to and from the site.
>
> As shown in new Tables VI.3a and VI.3b, all crosswalks at the Fifth Street/Mission Street intersection operate at acceptable LOS (LOS C or better) under existing conditions. All four crosswalks at the Fifth Street/Mission Street intersection would be expected to continue to operate at acceptable levels (LOS C or better) under the No Garage Alternative similar to the proposed project.
>
> The heaviest pedestrian traffic occurring under the No Garage Alternative would occur in the east and west crosswalks, crossing Mission Street. While some queuing is expected at all crossing locations, there is generally sufficient space at the corners to accommodate pedestrians waiting at the curb. The additional pedestrian traffic between the project site and the Fifth/Mission Garage could result in crowding at the corners during peak hours. Additional crowding at the southeast corner and existing pork-chop island could potentially reduce the vehicular capacity of the channelized northbound right turn lane at the Fifth Street/Mission Street intersection and may also create safety issues during peak periods. However, under the No Garage Alternative scenario, adequate service levels at all crosswalks would be maintained. Therefore, there would be no

significant adverse impacts related to pedestrian activity at the crosswalks similar to the proposed project.

Table VI.3a: Pedestrian Volumes on Mission Street Crosswalks – No Garage Alternative (New)

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B
No Garage Alternative	957	26.8	C	566	38.1	C

Source: AECOM, May 2010

Table VI.3b: Pedestrian Volumes on Fifth Street Crosswalks – No Garage Alternative (New)

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B
No Garage Alternative	402	77.8	A	513	49.5	B

Source: AECOM, May 2010

Sidewalk Level of Service

The sidewalk level of service (LOS) was calculated for the segment of the Fifth Street sidewalk between the Fifth Street/Mission Street and the Fifth Street/Stevenson Street intersections. Under the HCM methodology the sidewalk LOS is determined by taking the effective walkway width[55] at a typical section of sidewalk and identifying the space per pedestrian. This segment of the Fifth Street sidewalk has an effective walkway width of 11 feet. As shown in Table VI.3c, this segment operates at LOS D under existing conditions scenario and adequate service levels at all crosswalks would be maintained under the Existing Plus Project Conditions scenario and the No Garage Alternative. Although additional pedestrian traffic could result in more congested conditions on the Fifth Street sidewalk, the sidewalk would continue to operate at acceptable levels (LOS D). Therefore, there would be no significant adverse impacts related to pedestrian activity at the sidewalk.

[55] Effective walkway width, as defined in the Highway Capacity Manual, is the portion of a walkway that can be used effectively by pedestrians. Effective walkway width is the total walkway width less the sum of widths and shy distances from obstructions on the walkway.

Table VI.3c: Pedestrian Volumes on Fifth Street Sidewalk – No Garage Alternative (New)

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D
No Garage Alternative	676	16.27	D

Source: AECOM, May 2010

The first sentence of the last paragraph on EIR p. VI.13 is revised to reflect the results of the supplemental traffic analysis:

> There would be significant cumulative traffic impacts due to anticipated traffic growth which would cause or exacerbate adverse LOS E or F intersection operations at the following ~~seven~~ 12 study intersections under 2030 Cumulative Conditions Plus No Garage Alternative.

The bulleted list on EIR pp. VI.13-VI.14 is revised to add the five supplemental intersections.

> The following intersections would operate at LOS E or F under 2030 Cumulative conditions:
>
> - Fourth Street/Market Street;
> - Fifth Street/Mission Street;
> - Fifth Street/Howard Street;
> - Sixth Street/Market Street;
> - Sixth Street/Mission Street;
> - Fourth Street/Howard Street; ~~and~~
> - Stockton Street/O'Farrell Street;
> - Third Street/Mission Street;
> - Third Street/Folsom Street;
> - Seventh Street/Mission Street;
> - Seventh Street/Folsom Street; and
> - Eighth Street/Folsom Street.

The first sentence of the third paragraph on EIR p. VI.14 is revised to reflect the inclusion of the five supplemental study intersections:

> The ~~seven~~ 12 study intersections that would operate at LOS E or F under 2030 Cumulative Condition Plus No Garage Alternative were also reviewed using two different factors: the traffic generated by the alternative as a percent of total 2030 Cumulative traffic volumes, and as a percent of only the increase in traffic volumes between Existing and 2030 Cumulative conditions.

The fourth paragraph on EIR p. VI.14 is revised to reflect the results of the supplemental traffic analysis:

> At the Fourth Street/Market Street, Sixth Street/Market Street, ~~and~~ Stockton Street/O'Farrell Street, Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street intersections, the No Garage Alternative would make a minimal contribution ~~(between 0.3 and 3 percent)~~ to the growth in traffic volumes from Existing to 2030 Cumulative Conditions Plus No Garage Alternative. Although the alternative would add vehicles to poorly-operating critical movements at each location (southbound through at Fourth Street/Market Street, northbound through at Sixth Street/Market Street, ~~and~~ southbound through at Stockton Street/O'Farrell Street, northbound through at Third Street/Mission Street, northbound and eastbound through at Third Street/Folsom Street, eastbound through at Seventh Street/Mission Street, northbound through at Seventh Street/Folsom Street, and eastbound through at Eighth Street/Folsom Street), the contribution to the total volumes at these movements would be very low (between 0.1 percent and ~~0.7~~ 4.2 percent). Therefore, traffic generated by the alternative would not represent a cumulatively considerable contribution to the significant cumulative traffic impacts at the Fourth Street/Market Street, Sixth Street/Market Street, ~~or~~ Stockton Street/O'Farrell Street, Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street intersections.

Table VI.5 on EIR p. VI.15 is revised to add the five supplemental study intersections:

Table VI.5: Contribution to Critical Movements under 2030 Cumulative Conditions – No Garage Alternative (Revised)

	Intersection	Critical Movement[a]	Critical Movement LOS	Vehicle Contribution to Critical Movement	Percent Contribution to Critical Movement
1.	Fourth/Market	SBT	F	11	0.7%
		EBT	F	0	0%
5.	Fifth/Mission	NBT	F	5	0.5%
		EBT	D	54	7.0%
6.	Fifth/Howard	NBT	F	40	4.4%
		WBL/WBT	D	53	3.1%
7.	Sixth/Market	NBT	F	2	0.1%
		EBT	D	0	0%
9.	Sixth/Mission	SBT	F	0	0%
		EBT	D	54	6.6%
10.	Fourth/Howard	SBR	F	63	11.1%
		WBT	D	22	1.4%
11.	Stockton/O'Farrell	SBT	D	4	0.3%
		EBT	E	0	0%
	Third/Mission	NBT	F	4	0.2%
		EBT	C	0	0.0%
	Third/Folsom	NBT	F	11	0.6%
		EBT	F	13	0.5%

Intersection	Critical Movement[a]	Critical Movement LOS	Vehicle Contribution to Critical Movement	Percent Contribution to Critical Movement
Seventh/Mission	NBT	C	39	2.2%
	EBT	F	40	4.2%
Seventh/Folsom	NBT	F	16	0.9%
	EBT	C	0	0.0%
Eighth/Folsom	SBT	C	3	0.2%
	EBT	F	0	0.0%

Notes:
[a] NBT = Northbound Turn; EBT = Eastbound Turn; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right
Source: AECOM, October 2009 and May 2010

The second sentence of the third full paragraph on EIR p. VI.17 is revised to read:

> If the proposed new GHG significance threshold for operational-related emissions, circulated in the September and October 2009 BAAQMD *CEQA Guidelines Update* documents~~.~~, were adopted, the No Garage Alternative would contribute to operational-related GHG emissions and would have a significant impact on climate change much like the proposed project.

The following text is added after the Air Quality paragraph on EIR p. VI.17, to summarize the potential hazards impacts for the No Garage Alternative:

> **Hazards and Hazardous Material**
>
> As described above, demolition of the three existing buildings onsite and construction of the No Garage Alternative would result in one level below grade for retail and a customer pick up area. Although there would be less excavation than for the proposed project, some soils disturbance would result. There could be potential impacts from contaminated soils. However, as described in the NOP/IS pp. 85-93 with implementation of Mitigation Measure Haz-1 for additional testing and appropriate disposal, potential hazards impacts would be reduced to less than significant.

The Reduced Parking Variant of the No Garage Alternative that would provide the same amount of retail space with one level of below-grade off-street parking has been added to Chapter VI, Alternatives. Text describing this variant is added at the end of the Alternatives discussion after the Hazards discussion added to EIR p. VI.17 referenced above. All new text is shown as underlined text.

> **C.2 REDUCED PARKING VARIANT OF THE NO GARAGE ALTERNATIVE**
>
> **DESCRIPTION**
>
> The Reduced Parking Variant of the No Garage Alternative (Reduced Parking Variant) would involve the construction of an approximately 335,950-gsf building, with the same amount of space devoted to retail uses, loading, common areas, and mechanical and storage space as for the No Garage Alternative or the proposed project. In comparison to the No Garage Alternative, the Reduced

Parking Variant would provide two below grade levels, with one level of retail and one level of parking in the second basement level and would result in a net increase of 149,550 gross square feet of developed space on the project site. This variant would not have the same amount of building area devoted to parking and circulation as the proposed project, because it would not include the third basement level.[56]

The Reduced Parking Variant would not include the third basement level. In comparison to the No Garage Alternative and the proposed project, the variant would provide 80 off-street parking spaces instead of none or 188 parking spaces. Similar to the No Garage Alternative, the provision of fewer off-street parking spaces under this variant would result in a greater likelihood that employees and visitors would use public transit or would seek parking in other facilities in the area when the proposed 80-space parking garage is fully occupied. In addition, two parking spaces would be required to be reserved for exclusive use as car-sharing parking spaces, two more than with the No Garage Alternative and half as many as would be required under the proposed project. A minimum of 23 bicycle parking spaces would be provide on the B2 level, and off-street parking provided under this variant would not be free of charge.

Under this variant, the removal of the third basement level would reduce the overall building gross square feet, which would result in a change in the amount of transferable development rights (TDR) needed or may result in no need for TDR, depending on whether a variance from the requirements of *Planning Code* Section 102.11 is granted and on the applicability of the exceptions to FAR calculation identified in *Planning Code* Section 102.9(b).

The Reduced Parking Variant was added to the analysis in order to understand the potential environmental impacts that would result from a range in the amount of parking between the provision of no onsite parking as provided by the No Garage Alternative and the provision of two levels of parking as provided by the proposed project.

ENVIRONMENTAL ANALYSIS

As a variant of the No Garage Alternative, the analysis of the Reduced Parking Variant is focused on environmental topics where the analysis results differ from those for the No Garage Alternative and the proposed project. Similar to the No Garage Alternative and the proposed project, the Reduced Parking Variant would have a less-than-significant impact on land use and aesthetics. In addition, with the implementation of Mitigation Measures Cul-1 and Haz-1 potential impacts related to cultural and paleontological resources and hazards would be reduced to less than significant. Therefore, these topics are not discussed further. The results of the *Supplemental Transportation Analysis* indicate differences between the Reduced Parking Variant and the No Garage Alternative and between the

[56] The lot area for the basement level is 46,063 sf; however, the third basement level includes approximately 6,315 sf of unexcavated area. Therefore, less floor space would be devoted to parking and circulation (approximately 39,750 gsf).

Reduced Parking Variant and the proposed project. These results are presented below under the topics of Transportation and Circulation, Noise, and Air Quality.

Transportation and Circulation

Transportation and Circulation Assumptions

Similar to the No Garage Alternative and the proposed project, the Reduced Parking Variant would include the same amount of retail development. Although the trip generation characteristics would be the same as for the No Garage Alternative and the proposed project, the assignment of traffic to streets in the vicinity of the project site would be different.

Existing Conditions Plus Reduced Parking Variant

Approach and Methodology

Vehicle trips generated under the Reduced Parking Variant that could not be accommodated in the single parking level were assigned to nearby garages that have available capacity during the weekday midday peak period. This variant required a new traffic assignment based on a combination of the assignments used for the No Garage Alternative and the proposed project.

Traffic and Circulation Impacts

Similar to the No Garage Alternative, all study intersections would continue to operate at acceptable conditions (LOS D or better) under the Existing Plus Reduced Parking Variant with the exception of the Fourth Street/Market Street intersection (see Table VI.6). The significant impact at the Fifth Street/Stevenson Street intersection that would occur under the proposed project would be eliminated under the Reduced Parking Variant. As with the No Garage Alternative, the mitigation measures identified in the proposed project for this intersection would not be necessary under this variant. Furthermore, under this variant a total of 9 vehicles would be added to the southbound through movement at the Fourth Street/Market Street intersection, a critical movement at this intersection. Similar to the No Garage Alternative and the proposed project, the addition of these vehicles would not represent a significant contribution to the deficient operations at the intersection under the Reduced Parking Variant. There would not be a significant traffic impact and no mitigation would be necessary.

Table VI.6: Intersection LOS – Existing Plus Reduced Parking Variant of the No Garage Alternative (New)

	Intersection	Existing Conditions		Existing Plus Project		Existing Plus No Garage Alternative		Existing Plus Reduced Parking Variant		Impact Y/N
		LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	
1.	Fourth/Market	F	>80.0	F	>80.0	F	>80.0	F	>80.0	N
	With Enforcement	*F*	*>80.0*	*F*	*>80.0*	*F*	*>80.0*	*F*	*>80.0*	
2.	Fourth/Mission	C	28.7	C	29.0	C	28.9	C	28.9	N
	With Enforcement	*D*	*39.1*	*D*	*39.7*	*D*	*39.3*	*D*	*39.7*	
3.	Fifth/Market	C	27.0	C	28.6	C	27.4	C	27.4	N
	With Enforcement	*C*	*28.2*	*C*	*30.1*	*C*	*28.6*	*C*	*28.6*	
4.	Fifth/Stevenson[a]	D	27.6	E	**44.1**	D	27.3	D	27.5	N

	Intersection	Existing Conditions		Existing Plus Project		Existing Plus No Garage Alternative		Existing Plus Reduced Parking Variant		Impact Y/N
		LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay	
5.	Fifth/Mission	C	29.5	D	40.9	D	31.0	D	31.2	N
	With Enforcement	*C*	*31.8*	*D*	*43.5*	*D*	*33.4*	*D*	*33.4*	
6.	Fifth/Howard	C	22.3	C	25.2	C	26.8	C	24.8	N
7.	Sixth/Market	C	29.1	C	30.2	C	29.4	C	29.2	N
	With Enforcement	*C*	*31.0*	*C*	*32.2*	*C*	*31.2*	*C*	*31.2*	
8.	Sixth/Stevenson	C	21.9	C	22.0	C	22.0	C	22.0	N
9.	Sixth/Mission	D	36.7	D	39.1	D	39.7	D	37.7	N
	With Enforcement	*D*	*40.8*	*D*	*42.9*	*D*	*48.3*	*D*	*51.8*	
10.	Fourth/Howard	D	38.8	D	39.4	D	51.5	D	43.3	N
	Stockton/O'Farrell	C	28.3	C	32.8	C	34.1	C	29.1	N
	Third/Mission	C	22.8	C	23.0	C	22.9	C	22.8	N
	With Enforcement	*D*	*52.0*	*D*	*52.8*	*D*	*54.4*	*D*	*54.1*	
	Third/Folsom	D	46.1	D	49.2	D	48.5	D	47.7	N
	Seventh/Mission	C	27.5	C	28.1	C	31.6	C	29.2	N
	With Enforcement	*D*	*46.8*	*D*	*47.4*	***E***	***57.9***	*D*	*50.8*	
	Seventh/Folsom	C	28.7	C	29.7	C	31.5	C	30.2	N
	Eighth/Folsom	C	23.6	C	25.3	C	25.3	C	23.7	N

Notes: Delay in seconds per vehicle; **Bold** indicates unacceptable conditions; *Italics* indicate conditions with the enforcement of the transit-only lanes on Market Street and Mission Street.
[a] Stevenson at Fifth Street and Sixth Street were analyzed as unsignalized intersections.
Source: AECOM, October 2009 and May 2010.

Parking Impacts

Similar to the No Garage Alternative and the proposed project, the Reduced Parking Variant would generate a demand for 480 parking spaces during the weekday midday peak period. Nearby parking garages have a sufficient number of unoccupied parking spaces to accommodate the project vehicles. Under the Reduced Parking Variant the estimated increase in the weekday midday peak period occupancy at nearby garages would be less than that under the No Garage Alternative (see EIR p. VI.12).

Compared to the No Garage Alternative, the Reduced Parking Variant would increase area-wide parking capacity although less than the proposed project (construction of the proposed 188-space parking garage would increase area-wide parking capacity by less than 3.5 percent.) The Reduced Parking Variant like the No Garage Alternative and to a lesser degree the proposed project would increase the existing overall occupancy rate at the nearby parking garages. Additionally, the removal of one level of parking from the project would reduce the parking garage-related conflicts that would occur when vehicles access Stevenson Street from Sixth Street, cross the north sidewalk to enter and exit the parking garage, and when vehicles exit from Stevenson Street to Fifth Street although not as substantially as the No Garage Alternative. Although there would be a decrease in the number of on-site parking spaces, project-related vehicles accessing Stevenson Street under the Reduced Parking Variant would continue to be associated with the parking garage including the on-site shopper loading area.

Pedestrian Impacts

Under this variant, the reassignment of vehicles to the nearby garages would result in fewer pedestrian trips to the project site than under the No Garage Alternative but more than under the proposed project. The increase in the number of additional pedestrians on the sidewalks and crosswalks in the project area during the weekday PM peak hour parking demand would be less than the 850 additional pedestrians estimated under the No Garage Alternative. Overall, the Reduced Parking Variant would augment the 1,034 pedestrian and transit trips that would travel to and from the project site during the weekday PM peak hour under the proposed project with additional pedestrian trips from patrons who park at nearby garages and walk to the project site.

Since project vehicles were similarly reassigned, like the No Garage Alternative, the Reduced Parking Variant would have a minimal effect on pedestrian conditions in the Union Square area and the largest increases in pedestrian traffic would occur at the Fifth Street/Mission Street intersection.

During the weekday PM peak hour 275 project-related pedestrians would travel through the four crosswalks at the Fifth Street/Mission Street intersection and the sidewalk on the west side of Fifth Street between Mission and Stevenson Streets, 75 fewer pedestrians than under the No Garage Alternative. Pedestrian conditions at the crosswalks under this variant would be similar to those under the No Garage Alternative, i.e., the heaviest pedestrian traffic would occur in the east and west crosswalks crossing Mission Street. As shown in Tables VI.7 and VI.8, all crosswalks at the Fifth Street/Mission Street intersection would operate at acceptable LOS (LOS C or better) under Existing Conditions Plus Project, under the No Garage Alternative, and under the Reduced Parking Variant of the No Garage Alternative. As with the No Garage Alternative scenario, adequate service levels at all crosswalks would be maintained and there would be no significant adverse impacts related to pedestrian activity at the crosswalks.

Table VI.7: Pedestrian Volumes on Mission Street Crosswalks – Reduced Parking Variant of the No Garage Alternative (New)

Scenario	Mission Street Crosswalks					
	East			West		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	720	36.6	C	448	48.8	B
Proposed Project	868	29.8	C	522	41.3	B
No Garage Alternative	957	26.8	C	566	38.1	C
Reduced Parking Variant	919	28.2	C	548	39.3	C

Source: AECOM, May 2010

Table VI.8: Pedestrian Volumes on Fifth Street Crosswalks – Reduced Parking Variant of the No Garage Alternative (New)

Scenario	Fifth Street Crosswalks					
	North			South		
	Volume	Space	LOS	Volume	Space	LOS
Existing Conditions	355	89.0	A	395	65.4	A
Proposed Project	385	82.1	A	469	54.6	B
No Garage Alternative	402	77.8	A	513	49.5	B
Reduced Parking Variant	395	80.0	A	495	51.3	B

Source: AECOM, May 2010

Similar to the No Garage Alternative, pedestrian conditions on the Fifth Street sidewalk segment would become more congested under this variant. As shown in Table VI.9, this segment operates at LOS D under existing conditions scenario and adequate service levels at all crosswalks would be maintained under the Existing Plus Project Conditions scenario, the No Garage Alternative, and its Reduced Parking Variant. Therefore, as with the No Garage Alternative, there would be no significant adverse impacts related to pedestrian activity at the sidewalk.

Table VI.9: Pedestrian Volumes on Fifth Street Sidewalk – Reduced Parking Variant of the No Garage Alternative (New)

Scenario	Fifth Street Sidewalk		
	Volume	Space	LOS
Existing Conditions	510	20.8	D
Proposed Project	614	17.9	D
No Garage Alternative	676	16.27	D
Reduced Parking Variant	649	16.9	D

Source: AECOM, May 2010

Other Transportation Impacts

Similar to the No Garage Alternative, the Reduced Parking Variant would result in a general reduction in traffic volumes on the streets and alleyways adjacent to the project site, while traffic volumes on the streets surrounding the Fifth/Mission, Union Square, and Ellis/O'Farrell parking garages would increase. However, the effective decrease and increase in the traffic levels near the project site and the parking garages, respectively, would not be as noticeable as that for the No Garage Alternative. The Reduced Parking Variant would have effects more similar to those of the proposed project on transit, loading, bicycle, and construction-related traffic and parking.

2030 Cumulative Conditions Plus Reduced Parking Variant

An evaluation of the Reduced Parking Variant's contribution to critical movements at the 14 study intersections that would operate at LOS E or F under 2030 Cumulative Conditions was conducted to determine whether this variant would be considered to have a cumulatively considerable contribution to

significant impacts at these intersections. As shown in Table VI.10, at the Fourth Street/Market Street, Fifth Street/Market Street, Sixth Street/Market Street, Stockton Street/O'Farrell Street, Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street intersections, the Reduced Parking Variant would make a minimal contribution to the growth in traffic volumes from Existing Conditions to 2030 Cumulative Conditions. Although the variant would add vehicles to poorly-operating critical movements at each location, its contribution to the total volumes at these movements would be very low (between 0.2 percent and 1.1 percent). Therefore, similar to the No Garage Alternative, traffic generated by the variant would not represent a cumulatively considerable contribution to the significant cumulative traffic impacts at the Fourth Street/Market Street, Fifth Street/Market Street, Sixth Street/Market Street, Stockton Street/O'Farrell Street, Third Street/Mission Street, Third Street/Folsom Street, Seventh Street/Mission Street, Seventh Street/Folsom Street, and Eighth Street/Folsom Street intersections.

Table VI.10: Contribution to Critical Movements – 2030 Cumulative Conditions Plus Reduced Parking Variant (New)

	Intersection	Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
1.	Fourth Street / Market Street	SBT EBT	F D	6 0	0.4 0.0	N
3.	Fifth Street / Market Street	NBT EBT	F F	2 0	0.2 0.0	N
4.	Fifth Street / Stevenson Street	EBL EBR	F C	5 32	15.6 27.8	Y
5.	Fifth Street / Mission Street	SBT EBT	F E	32 27	4.5 3.6	N
6.	Fifth Street / Howard Street	NBT WBT	F D	20 26	2.2 1.6	N
7.	Sixth Street / Market Street	NBT EBT	F C	2 0	0.1 0.0	N
9.	Sixth Street / Mission Street	SBT EBT	F C	0 27	0.0 3.4	N
10.	Fourth Street / Howard Street	SBR WBT	F D	27 16	4.5 1.0	N
	Stockton Street / O'Farrell Street	SBT EBT	D E	3 0	0.2 0.0	N
	Third Street / Mission Street	NBT EBT	F C	2 0	0.1 0.0	N
	Third Street / Folsom Street	NBT EBT	F F	11 6	0.6 0.4	N
	Seventh Street / Mission Street	NBT EBT	C F	20 20	1.1 2.7	N
	Seventh Street / Folsom Street	NBT EBT	F C	7 0	0.4 0.0	N

Intersection	Critical Movement	Critical Movement LOS	Project Vehicle Contribution to Critical Movement	Project % Contribution To Critical Movement	Impact Y/N
Eighth Street /	SBT	C	10	0.7	N
Folsom Street	EBT	F	0	0.0	

Notes:
[a] NBT = Northbound Turn; EBT = Eastbound Turn; EBL = Eastbound Left; EBR = Eastbound Right; SBT = Southbound Turn; WBT = Westbound Turn; WBL = Westbound Left; SBR = Southbound Right
Source: AECOM, May 2010

Under the Reduced Parking Variant, project-generated traffic at the Fifth Street/Mission Street intersection would make a moderate to high contribution to the growth in traffic volumes between Existing Conditions and 2030 Cumulative Conditions. The variant would add traffic to both of the critical movements (the southbound through and eastbound through movements) that operate at LOS F and E, respectively. The traffic generated by the variant would not represent a cumulatively considerable contribution to the significant cumulative traffic impact at the Fifth Street/Mission Street intersection, because its contribution to these movements would be minor (4.5 and 3.6 percent, respectively). Therefore, similar to the No Garage Alternative, the Reduced Parking Variant's traffic would not represent a cumulatively considerable contribution to the significant cumulative impacts at the Fifth Street/Mission Street intersection, unlike the proposed project.

At the Fifth Street/Howard Street intersection, the Reduced Parking Variant would make a moderate to high contribution to the growth in traffic volumes between Existing Conditions and 2030 Cumulative Conditions. The variant would add traffic to both of the critical movements (northbound through and westbound through movements) that operate at LOS D and F, respectively. Its contribution to the northbound through movement would be minor (2.2 percent) and the intersection would continue to operate at an acceptable level (LOS D). Its contribution to the westbound through movement would also be minor (1.6 percent), but the intersection would operate at an unacceptable level (LOS F). The traffic generated by the variant would not represent a cumulatively considerable contribution to the significant cumulative traffic impact at the Fifth Street/Howard Street intersection, because the Reduced Parking Variant, similar to the No Garage Alternative, would not add substantial volumes to the northbound through movement, which determines overall poor operating conditions at this intersection.

At the Fourth Street/Howard Street intersection, the Reduced Parking Variant would make a moderate to high contribution to the growth in traffic volumes between Existing Conditions and 2030 Cumulative Conditions. The variant would add traffic to both of the critical movements (southbound right and westbound through) that operate at LOS F and D, respectively. Its contribution to the southbound right movement would be minor (4.5 percent), and it would continue to operate at LOS F. Its contribution to the westbound through movement would also be minor (1.0 percent), and it would operate at an acceptable level (LOS D). Therefore, unlike the No Garage Alternative, the

traffic generated by the variant would not represent a cumulatively considerable contribution to the significant cumulative traffic impact at the Fourth Street/Howard Street intersection, because the Reduced Parking Variant would not add substantial volumes to either movement, which determine overall poor operating conditions at this intersection.

At the Sixth Street/Mission Street intersection, the Reduced Parking Variant would make a moderate to high contribution to the growth in traffic volumes between Existing Conditions and 2030 Cumulative Conditions. However, the variant would only add traffic to the eastbound through critical movement which currently operates at LOS C. Therefore, similar to the No Garage Alternative, the Reduced Parking Alternative's traffic would not represent a cumulatively considerable contribution to the significant cumulative impacts at the Sixth Street/Mission Street intersection.

Under the Reduced Parking Variant, project-generated traffic at the Fifth Street/Stevenson Street intersection would make a moderate to high contribution to the growth in traffic volumes between Existing Conditions and 2030 Cumulative Conditions. The variant would add traffic to both of the critical movements (eastbound left turn and right turn movements). The variant would add five vehicles to the eastbound left turn movement and 32 vehicles to the eastbound right turn movement. Only the left turn movement would operate at unacceptable levels (LOS F) under 2030 Cumulative Conditions. Since the alternative would add substantial volumes to the eastbound left and right turn movements that would experience unacceptable delays and determine overall poor operating conditions at this intersection, the Reduced Parking Alternative's traffic would represent a cumulatively considerable contribution to the significant cumulative impact at the Fifth Street/Stevenson Street intersection similar to the Proposed Project.

Thus, the Reduced Parking Variant under 2030 Cumulative Conditions would not generate any new significant cumulative impacts when compared to the No Garage Alternative and the proposed project. The Reduced Parking Variant would avoid one significant traffic impact (Fourth Street/Howard Street) under cumulative conditions when compared to the No Garage Alternative, would avoid one significant traffic impact (Fifth Street/Mission Street) under cumulative conditions when compared to the Reduced Intensity Alternative, and would avoid one impact (Fifth Street/Mission Street) under cumulative conditions when compared to the proposed project.

Noise

Traffic-related noise impacts due to the Reduced Parking Variant were determined to be less than significant, because the amount of space devoted to retail use and the number of truck trips to the proposed loading docks on Stevenson Street would be the same under this variant as with the No Garage Alternative and the proposed project. With the provision of 80 off-street parking spaces rather than none, as under the No Garage Alternative, the number of vehicle passbys on Stevenson Street would be greater, and, as a result, the sensitive receptors (residential uses at the east end of Stevenson Street) would be exposed to more traffic-generated noise in comparison to the No Garage

Alternative. Conversely, with the provision of fewer off-street parking spaces than under the proposed project, the number of vehicle passbys on Stevenson Street would be reduced, and, as a result, the sensitive receptors (residential uses at the east end of Stevenson Street) would be exposed to less traffic-generated noise in comparison to the proposed project.

Air Quality

Under the Reduced Parking Variant, the excavation, grading, foundation, and other ground disturbing activities would be greater than that for the No Garage Alternative but less than that for the proposed project, because there would be one level of underground parking. As a result the temporary increase in particulate matter and other criteria air pollutants and their affect on localized air quality would be slightly more than that for the No Garage Alternative but slightly less than that for the proposed project. Similar to the No Garage Alternative and the proposed project, adherence to the Construction Dust Control Ordinance would reduce potential air quality impacts to a less-than-significant level.

In addition, the building space devoted to retail, the number of vehicle trips to the project vicinity, and the number of truck trips to the proposed loading docks on Stevenson Street would be the same as the No Garage Alternative and the proposed project. Since the proposed project, the No Garage Alternative, and the Reduced Parking Variant would generate the same number of daily vehicle trips, the effects of project-generated traffic on regional air quality emissions under this variant would be the same as the air quality effects of the No Garage Alternative and the proposed project. The *Supplemental Transportation Analysis* took the conservative approach of assuming that the Reduced Parking Variant would generate the same number of trips as the No Garage Alternative with no parking and the proposed project with two levels of available parking. However, it should be noted that, like the No Garage Alternative, the Reduced Parking Variant could potentially discourage some drivers, resulting in fewer vehicle trips and lower levels of GHGs. However, this would not reduce GHGs from vehicle miles traveled altogether. Therefore, like the proposed project and the No Garage Alternative, the Reduced Parking Variant's impact on GHGs would remain less than significant using the City's significance criteria, and there would be no significant air quality impacts based on existing adopted BAAQMD thresholds.

The cumulative impact analysis of the Reduced Parking Variant indicates that the operational-related impacts of ROG, NO_x, and PM_{10} emissions would be less than significant. The variant would be subject to the same set of local and regional air quality plans and policies related to its operational characteristics. Thus, as with the proposed project and the No Garage Alternative, the Reduced Parking Variant is consistent with the land use designations for the project site, as defined in the *General Plan* and the *Planning Code*, and the variant would not result in a cumulatively considerable increase in regional air quality pollutants.

The approach to the analysis of the Reduced Parking Variant was conservative and did not alter any of the GHG-emitting activities of the proposed project. The variant would share similar operating characteristics as the proposed project and

the No Garage Alternative. The building space devoted to retail, the number of vehicle trips to the project vicinity, and the number of truck trips to the proposed loading docks on Stevenson Street would be the same under this variant as under either the No Garage Alternative or the proposed project. Since the variant would generate the same number of daily vehicle trips as the proposed project and the No Garage Alternative, the effects of project-generated traffic on regional air quality emissions under this variant would be the same as the air quality effects of the proposed project and the No Garage Alternative. Thus, as concluded for the proposed project and the No Garage Alternative, this variant would not contribute significantly, either individually or cumulatively, to global climate change under the existing *BAAQMD CEQA Guidelines*.

If the proposed new GHG significance threshold for operational-related emissions, circulated in the September, October, and December 2009 BAAQMD *CEQA Guidelines Update* documents, were adopted, the Reduced Parking Variant would contribute to operational-related GHG emissions and would have a significant impact on climate change much like the No Garage Alternative and the proposed project. In addition, the Reduced Parking Variant would result in exceedances of ROG similar to those of the No Garage Alternative and the proposed project. These would be mitigated through the implementation of Mitigation Measure AQ-2 – Use of Low-VOC Architectural Coatings. Therefore, for all of the reasons discussed above, the Reduced Parking Variant would have a significant unavoidable impact on climate change much like the proposed project and the No Garage Alternative under the proposed BAAQMD significance criteria.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Text for the Reduced Parking Variant of the No Garage Alternative is added to the second paragraph on EIR p. VI.18.

> Below is a discussion regarding the factors utilized to determine the environmentally superior alternative for this project based on the results of the evaluation of the Reduced Intensity Alternative as compared with the No Garage Alternative and the Reduced Parking Variant of the No Garage Alternative in this chapter.

Text for the Reduced Parking Variant is added to the third paragraph on EIR p. VI.18.

> With respect to air quality, ~~both~~ the Reduced Intensity Alternative ~~and~~, the No Garage Alternative, and the Reduced Parking Variant all would have a significant impact on global climate change if the proposed new thresholds in the BAAQMD *CEQA Guidelines Update* were adopted in their current form. It can reasonably be assumed that for ~~both of~~ these alternatives and for the variant the contribution to GHG emissions would be less than from the proposed project. However, when comparing ~~both~~ the alternatives and the Reduced Parking Variant with one another, it is unknown which would have fewer GHG impacts, the No Garage Alternative and its Reduced Parking Variant or the Reduced Intensity Alternative.

Text for the Reduced Parking Variant is added to the fourth paragraph on EIR p. VI.18.

> While the Reduced Intensity Alternative would be a smaller development on the project site and would require less energy for heating and likely less water use and energy associated with the transport of water, the Reduced Intensity Alternative would accommodate fewer retailers (two to three) than the proposed project or the No Garage Alternative and its Reduced Parking Variant (all likely to have five or six). The two to three retailers that would not occupy the smaller development project site would need to find facilities elsewhere in San Francisco or in the Bay Area region. The remaining two to three retailers would occupy building space of similar size. If the building space occupied by the retailers not accommodated at the project site is a new building with updated energy and water efficiencies incorporated into it, then overall energy use resulting from the Reduced Intensity Alternative and the energy use associated with the buildings occupied by the relocated retailers would be similar to that with the No Garage Alternative or the Reduced Parking Variant. However, if these two to three retailers relocate to older buildings without energy and water upgrades, or to jurisdictions without mandatory green building requirements, then the Reduced Intensity Alternative could result in an overall increase in cumulative energy use and the respective GHG emissions.

Text for the Reduced Parking Variant is added to the second sentence of the second paragraph on EIR p. VI.19.

> However, while the ~~*Transportation Study*~~ transportation analyses for this project took the conservative approach of assuming that the No Garage Alternative and its Reduced Parking Variant would each generate the same number of vehicle trips as the proposed project with available parking, it should be noted that the No Garage Alternative and its Reduced Parking Variant could potentially discourage driving, resulting in fewer vehicle trips and lower levels of GHGs.

Text for the Reduced Parking Variant is added to the third paragraph on EIR p. VI.19.

> With respect to construction-related impacts, with one below grade level both the No Garage Alternative and the Reduced Intensity Alternative would require less excavation and soils disturbance of the project site than ~~the Reduced Intensity Alternative~~ the Reduced Parking Variant. This would minimize disruption in the project vicinity for the No Garage Alternative and the Reduced Intensity Alternative since the period of time needed to contain construction activities to the project site would likely be shortened.

Text for the Reduced Parking Variant is added to the fourth paragraph on EIR p. VI.19.

> ~~Both t~~The No Garage Alternative, its Reduced Parking Variant, and the Reduced Intensity Alternative would decrease significant project-specific and 2030 cumulative traffic impacts. ~~Both~~ The alternatives and the variant would continue to experience traffic impacts related to loading activities and would require implementation of Mitigation Measure M-TR-2 to limit loading from project-related trucks longer than 30 feet to nighttime hours (10:00 PM to 6:00 AM). While neither of the alternatives nor the Reduced Parking Variant would result in

a significant impact at the intersection of Fifth Street and Stevenson Street under Existing Plus Project/Alternative conditions, the Reduced Intensity Alternative and the Reduced Parking Variant of the No Garage Alternative would result in increased traffic on Stevenson Street when compared with the No Garage Alternative, and therefore, create the potential for increased conflicts with pedestrians. These potential effects would be less with the No Garage Alternative since, aside from delivery truck traffic, the vehicle traffic would be limited to retail customer pick-up and returns.

Text for the Reduced Parking Variant is added to the first paragraph on EIR p. VI.20.

~~In addition, b~~Both alternatives and the Reduced Parking Variant would contribute to a significant cumulative traffic impact under 2030 cumulative conditions. For the Reduced Intensity Alternative, a significant cumulative impact would occur at the intersection of Fifth Street and Mission Street. Intersection operation would deteriorate from LOS C to LOS E, and the Reduced Intensity Alternative would contribute to the southbound through critical movement. For the No Garage Alternative, a significant cumulative impact would occur at the intersection of Fourth Street and Howard Street. Intersection operation would deteriorate from LOS D to LOS E, and the No Garage Alternative would contribute considerably to the increased delay at the southbound right critical movement. For the Reduced Parking Variant, a significant cumulative impact would occur at the intersection of Fifth Street and Stevenson Street. Intersection operation would remain at LOS E. The Reduced Parking Variant would contribute considerably to the increased delay at the eastbound left turn critical movement. ~~Therefore, t~~The deterioration in the LOS under 2030 Cumulative conditions at Fifth Street and Mission Street as a result of the Reduced Intensity Alternative would be of greater magnitude than that at Fourth Street and Howard Street as a result of the No Garage Alternative. As described, there would be a significant cumulative impact at Fifth Street and Stevenson Street as a result of the Reduced Parking Variant.

Text for the Reduced Parking Variant is added to the last paragraph on EIR p. VI.20.

Therefore, for the reasons given above, the No Garage Alternative and its Reduced Parking Variant would be considered the environmentally superior alternative to the proposed project.

EIR APPENDIX A: NOTICE OF PREPARATION/INITIAL STUDY

Cultural and Paleontological Resources (Topic 4a)

Footnote 35 on NOP/IS p. 36 in Appendix A of the EIR has been revised to provide the full citation for the 2007 Historic Resource Evaluation Response.

[35] San Francisco Planning Department, *Revised Historic Resource Evaluation Response, 935, 943, and 949-961 Market Street*, memorandum November 1, 2007. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, CA, San Francisco, as part of Case File 2005.1074E.

Appendix A

Comment Letters

ARTHUR D. LEVY
ATTORNEY

LETTER A

December 21, 2009

BY HAND AND EMAIL

Mr. Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street
Suite 400
San Francisco, California 94103

Re: **935-965 Market Street (CityPlace) Draft EIR**
Case No. 2005.1074E

Dear Mr. Wycko:

As a native San Franciscan and citizen concerned about retaining the distinctive character of our City's commercial districts and neighborhoods, I am pleased to submit the following comments regarding the Draft Environmental Impact Report (DEIR) for the "CityPlace" project.

Market Street is not only visually but also psychologically prominent to San Franciscans and its millions of visitors. Mid-Market, which stretches from Powell to Polk Streets, remains a central feature of this quintessentially San Franciscan urban environment.[1] Uniquely evocative of the City's regeneration after the Earthquake and Fire, Mid-Market is bounded by the historic hub at Powell and Market on the east and by Civic Center on the west.

The CityPlace project lies in an acutely sensitive zone. The Powell and Market shopping, tourist, and transit center lies within line of sight, half a block to the east. On the west, the project is a few doors down from the National Register Market Street Theater and Loft District. The district includes the landmarked Wilson Building at 973 Market on the same side of the block, and extends west of the project up both sides of Market Street. The Planning Commission and the Board of Supervisors must closely review the impact of this project on this fragile and distinctive environment.

8.6 (A-1)

[1] See "up from the deep (the hotel project) — Part Two: Mid-Market", http://upfromthedeep.com/mid-market/ [as of Dec. 20. 2009].

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Telephone: 415.702.4550 Fax: 415.814.4080 E-mail: arthur@yesquire.com

The DEIR does not address the historic or architectural value of the buildings proposed to be demolished, or their contribution to the historic, architectural, and visual character of Mid-Market. The draft does not discuss or evaluate how the demolition of these buildings and their replacement with a modern shopping center will affect the district's character, which is enriched by several landmark buildings that surround the project site. The DEIR does not discuss the relationship of the existing buildings or the proposed new building to the adjacent Powell and Market hub or the National Register Historic Districts adjacent to the project.

6.1 (A-2)

8.6 (A-3)

8.6 (A-4)

In sum, the DEIR does not contain sufficient discussion, study, and illustrative and photographic material to enable the decision making bodies to evaluate the historic, architectural, and visual impacts of the project, not only on the buildings to be demolished, but also on the character of Mid-Market. This letter is intended to assist the Planning Commission and the Board of Supervisors in achieving meaningful and good faith environmental review of these dimensions and impacts of the project.

6.1 (A-5)

1. The Project Description

1.1. Statement of Project Objectives: The statement of project objectives is unduly narrow because it tends to limit CEQA's required development and evaluation of mitigation measures and project alternatives to a "large retail project" in the project location. As the DEIR's limited discussion of alternatives suggests, the statement of objectives artificially limits the DEIR's alternatives and mitigation analysis by apparently ruling out alternatives other than a large new retail complex. The DEIR does not consider alternatives such as incorporating and reusing one or more of the existing buildings for retail, office, or commercial use. The statement of objectives should be broadened to allow consideration of creative reuse alternatives that will reduce the adverse impacts on the surrounding visual, architectural, and historic character of Mid-Market and permit the meaningful environmental review and analysis that CEQA requires.

3.1 (A-6)

1.2. Statement of Environmental Characteristics:

1.2.1. The statement of environmental characteristics does not contain a discussion of Mid-Market's architectural, visual, and historic context sufficient to enable the decision making bodies to evaluate the impact of demolition of the existing buildings and construction of a new shopping center on the Mid-Market corridor. **6.1 (A-7)**

1.2.2. The statement fails to place the project in the context of the historic and visual character of the block in which the project is located. The project is located between the National Register Hale Brothers Department Store [901 Market Street], on the one side, and the locally landmarked Wilson Building [973 Market Street] and the Hale Brothers Building [979 Market], on the other. The project is directly across the street from the locally landmarked Garfield Building [938-942 Market Street], Mechanics Savings Building [948 Market Street], and Warfield Theater [982 Market Street]. Nearby landmarks also include the locally landmarked Flood Building [879-898 Market Street] and the National Register U.S. Mint Building [88 Fifth Street] and Haas Candy Factory [54 Mint Street]. **8.6 (A-8)**

1.2.3. The statement of environmental characteristics is also deficient in failing to place the buildings proposed to be demolished and the new shopping center in the context of the two adjacent National Register Historic Districts, the Market Street Theatre and Loft District (982-1112 Market, 973-1105 Market, 1 Jones, and 1-35 Taylor Streets) and the Uptown Tenderloin National Register Historic District (comprising 33 blocks in the north of Market Tenderloin district). **8.6 (A-9)**

1.2.4. The statement of environmental characteristics should be revised to place the project in the context of the visual, architectural, and historic character of Mid-Market, including the Powell and Market **6.1 (A-10)**

hub, the surrounding landmark buildings, and the two adjacent Historic Districts. 6.1 (A-10) (continued)

1.3. Absence of Consultations: The project description does not reflect any consultation with the National Park Service or the State Historic Preservation Office, which oversee the National Register Historic Districts and the adjacent National Register buildings. 8.2 (A-11)

2. **Historic, Cultural, and Aesthetic Environmental Setting:** The environmental setting discussion likewise does not provide a baseline of conditions sufficient to enable the decision making bodies to evaluate the impacts of the project on the visual, architectural, and historic character of Mid-Market. As noted above, the DEIR fails to place the existing buildings on the project site and the proposed new construction in their Mid-Market context. The environmental setting sections should provide information to enable a good faith evaluation of the relationship between the existing buildings and the proposed new shopping center and the character of the commercial district, including Powell and Market, the surrounding landmark buildings and the two Historic Districts. 6.1 (A-12)

3. **Historic, Cultural, and Aesthetic Impacts:**

3.1. The DEIR fails to assess the significance of St. Francis Theater and retail shops at 947-964 Market Street as an historical resource. The St. Francis is a rare surviving San Francisco work of renowned architect John Galen Howard (1864-1931), the Supervising Architect of the Master Plan for University of California at Berkeley and the founder of the UC School of Architecture. Howard designed Berkeley's world famous Campanile and Doe Memorial Library, among several other National Register buildings on the Berkeley campus. In San Francisco, he designed the Adam Grant Building and the Bill Graham (Civic) Auditorium, but few other surviving commercial buildings and no other surviving theater. 8.4 (A-13)

3.1.1. The St. Francis operated as a movie theater and retail shops from its opening in 1910 until its closing in 2001. The St. Francis is individually rated in the San Francisco Downtown Survey as Category "B" ("of individual importance by virtue of architectural, historical and environmental criteria"), and as a "Priority I"

building (meaning highest priority for preservation) on the UMB survey.

3.1.2. Entirely apart from the former movie theater auditorium, the St. Francis contributes to the character of the block through the ornament and fenestration on the façade of the retail shops on Market Street.[2] The theater is located behind the shops, and is accessed though a passageway at the west end of the building.

3.1.3. The character defining façade ornament and windows opening onto Market Street remain intact beneath the signage and are restorable, as are the retail shops themselves. The Downtown Survey reported that although the window wall composition has been covered up by signage, the "Handsome Renaissance/Baroque ornamentation is still visible, primarily in the cornice."

3.1.4. As a theater, the St. Francis is listed in the city's 2006 Context Statement as a candidate for the "San Francisco Neighborhood Movie Theater Non-contiguous Multiple Property Historic District." There is a dispute as to the integrity of the theater auditorium and whether "all historic fabric" has in fact been removed. The City should allow investigation and substantiation of a recent eyewitness report that the auditorium remains intact before proceeding further.

8.4 (A-13) (continued)

8.4 (A-14)

[2] Photo: St. Francis Theater and Storefronts in 1953. "up from the deep (the hotel project) — Part Two: Mid-Market", http://upfromthedeep.com/mid-market/ [as of Dec. 20, 2009].

3.2. The storefront of the building at 941-945 Market, also proposed for demolition as part of the project, is described in the Downtown Survey as "an excellent example of an Art Deco design." The survey rates the building as "C", having contextual importance, presumably a reference to its façade. The building is also classified as a "Priority I" building (meaning highest priority for preservation) in the UMB survey, and rated "3" out of 5 on the 1976 Citywide Architectural Survey. **8.5 (A-15)**

3.3. As noted above, apart from the significance of these buildings as historical resources themselves, the DEIR fails to assess the impact of their demolition and replacement with a modern shopping center on the visual, architectural, and historic character of the surrounding district. **6.1 (A-16)**

3.4. The DEIR does not analyze the cumulative impact of the demolition of these buildings and their replacement with a large modern building on the character of the Mid-Market corridor. There is no list of past, ongoing, and expected future demolitions or reference to any adopted study that might be sufficient to support a cumulative impact determination in compliance with CEQA Guideline § 15130(b)(1). **6.1 (A-17)**

4. **Land Use Plans and Policies, Setting and Impacts.** This discussion of does not recognize, discuss, or analyze the inconsistency of the project with the following Priority Policies: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) discouragement of commuter automobiles; and (4) landmark and historic building preservation. **1.0 (A-18)**

5. **Alternatives.**

5.1. Other than the No Project alternative, each of the alternatives selected is for the construction of a large new shopping center. This unreasonably limits consideration of alternatives and mitigations to a project that is substantially of the same character and scale as the one proposed. No alternative has been offered to enable consideration of incorporating and creatively reusing one or more of the existing buildings, either as part of the shopping center or as commercial or office space. A reuse alternative should be developed to enable the decision making bodies to **3.1 (A-19)**

evaluate mitigating the adverse impacts of the project on the existing buildings and the character of the Mid-Market corridor.

5.2. There is no explanation of the rationale for selecting the alternatives discussed.

5.3. There is no identification of any alternatives that were considered and rejected.

3.1 (A-19) (continued)

*****

Thank you for your consideration of these points and for your expected responses.

Respectfully submitted,

Arthur D. Levy

ADL:msj

cc: Debra Dwyer (by email)
Mark Ellinger (by email)
San Francisco Architectural Heritage (c/o Jack Gold by email)

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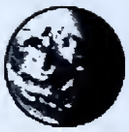

"Jane Weil"
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To <jim.miller@sfgov.org>, <debra.dwyer@sfgov.org>
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Subject case 2005.1074E

Hello. I am a resident of SOMAGrand, 1160 Mission St, and walk down mid-Market St frequently. I have also worked in Historic Preservation and have studied the Department of Interior Guidelines.

I am writing about the proposed "City Place" commercial development for 935-965 Market Street, case 2005.1074E, block3704, lots 71-2-3. The current proposal requests permission to totally demolish the three existing buildings and replace them with one large contemporary building. It makes a case that the original buildings have been so altered over the years, that there is nothing of historic value to preserve. I disagree. I request that the developer be required to preserve the existing front facades, and restore them to their original 1909 appearance. There are many remnants of the original facades visible. I support the overall project concept and anything that can improve Market Street between 5th & 8th, but I hate to lose the beautiful facades and have them replaced with a cold, flat, uninteresting "varied glass curtain wall system" (page 7 of the Initial study). I would propose constructing the new building behind and above the historic facades.

8.4
(B-1)

Thank you very much for your consideration,
Jane Weil

LETTER C

SIERRA CLUB
SAN FRANCISCO GROUP

85 Second Street, Box SFG, San Francisco, CA

December 16, 2009

Bill Wyko, Environmental Review Officer
Planning Department, FAX 558-6409
1660 Mission Street
San Francisco CA 94103-2414

Re: 935-965 Market Street DEIR Case No. 2005.1074

Dear Mr. Wycko,

Thank you for the opportunity to comment on the subject DEIR. The Sierra Club also thanks you for including an analysis of the No Garage Alternative in DEIR. The Sierra Club requests a correction to this DEIR which will tend to reduce the suggested traffic impacts of the project and the no garage alternative:

Re: Page IV.C.24 Mode Split: This paragraph uses 2002 C-3 District data to show mode splits by auto for work trips and non-work trips. This data is no longer appropriate because the current and future higher gasoline prices, tolls, and parking fees have already reduced driving as shown by the reduced utilization of parking at the nearby City owned garages. Future driving will also be reduced as San Francisco takes steps to comply with AB 32 and SB 375 and Metropolitan Transit Agency proposals are implemented to reduce the citywide driving modal split by fifty percent.. The reduced garage patronage provides some guidance to determine current lower auto modem splits and the future changes can be estimated. Correcting the mode splits will also require correction of most of the numbers and tables that follow.

2.2 (C-1)

Historically DEIRs include estimates of future traffic based on projections by certain agencies. DEIRs should also include estimates of traffic reductions based on the impact of laws and agency proposals. If DEIRs do not include estimates of future reductions in the auto modal split the analysis, and what follows, could tend to enable additional driving.

2.3 (C-2)
2.2 (C-3)

Very truly yours,

Howard Strassner, Emeritus Chair Transportation Committee
419 Vicente, San Francisco CA 94116, 661-8786, (h,w)
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LETTER D

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November 18, 2009

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DEC 14 2009

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
MEA

Environmental Review Officer
San Francisco Planning Department
1650 Mission Street Suite 400
San Francisco Ca 94103

Regarding:
Draft EIR
935-965 Market Street
Transportation Study
Case #2005.1074E

Environmental Review Officer,

I have read the DEIR regarding the 935-965 Market Street project "City Place". As stated before, we here at Pearl Art & Craft at 969 Market Street (immediately west of the proposed project) are generally in favor of the plan. Our concerns have been mainly with our right to continue to receive our merchandise on Stevenson in a designated loading zone adjacent to our building. After reading the DEIR it seems these concerns have been voiced in the content of the draft. Thank you for addressing our issues.

2.9
(D-1)

2.9
(D-2)

There was one point I had not seen in the original rough draft, or that is new in the DEIR, which says in IV.C.37:

> "two spaces about 55 feet west of the project sight would be reconfigured as a loading zone to replace the loading area proposed to be removed across from 969 Market Street (on Stevenson) to provide adequate space for an eastbound vehicle to enter the project parking garage", etc

The above proposed idea might now be a moot point, but this would be a compromise we could work with if it comes up again.

I would like to reiterate, that we support the plan as long as we can continue to legally receive trucks at the curb on Stevenson either where our yellow zone is currently located or to the west 55 feet from the project as stated above. Also, we could compromise our shipping and receiving hours from our current time of10:00 to 5:00pm to 9:00 till 12 noon. Anything coming after noon could be received on Market Street or in conjunction with the City Place's loading dock (assuming we would have use of their forklift). Our priority is to maintain clearly written loading hours and to avoid a verbal agreement or assurance regarding our loading practices. We welcome the change to our neighborhood.

Thank you for your time,
Joni Marie Theodorsen
Pearl Art & Craft
969 Market Street
San Francisco, Ca 94103

Comments on Draft Environmental Impact Report,
935-965 Market Street Project
San Francisco, California

December 10, 2009

Historic Resources

947-965 Market Street (Former Empress Theater)

The evaluation dismisses the historic significance of the building by saying "the building no longer retains integrity (of design, material, workmanship, setting, feeling and association) such that it no longer conveys its historic architectural significance."

8.4 (E-1)

1. There are seven aspects of integrity. Why are only six cited? Note: this also applies to the other two properties.

2. There is no evaluation of any of the "aspects" that define the integrity of a historic resource. Please respond by providing a detailed evaluation of all seven aspects of integrity for all properties.

Although much of the façade is currently covered over and therefore not visible, an investigation should be made of what exists underneath. Evidence of the upper level windows shows that, at least what is visible, has been changed from the original (as shown on page 93, Splendid Survivors). However, an evaluation is required of whether the changes to the Market Street façade have gained historic significance over time. The upper windows were removed and replaced. Aren't these windows representative of a time, style and other evaluative criteria that make them a historic part of the evolution of the building?

And what about the storefronts and other parts of the façade that are currently covered up? The DEIR says "including...concealment of large portions of the façade..." Concealment cannot be used as a factor to dismiss an evaluation of integrity. If that was acceptable, any project sponsor could place plywood over various parts of a building concealing what is behind. For purposes of a CEQA do we then say that because it isn't visible, it has no integrity? An evaluation is required of what actually exists behind what is "concealed," including descriptions and an evaluation of whether any modifications over time have gained historic significance of their own, even though they post-date the original design.

3. What were the comments of the City Planning Department's Preservation Technical Specialists on the historic resources evaluation?

8.1 (E-2)

4. What were the comments of the Historic Preservation Commission (HPC) on the DEIR? If the HPC did not review the DEIR, why was it not scheduled for a hearing?

8.1 (E-2) (continued)

5. The DEIR repeatedly cites the conclusions of the Mid-Market Redevelopment Plan Final EIR as part of Question 4a of the Initial Study. The historic resources evaluation conducted for that document, which includes the DEIR, is now at least 10 years old. No evaluation is cited as to why a decade old survey is currently adequate for evaluation today. It would be helpful to know what methodology was used to prepare the historic resources evaluation for the DEIR, the assumptions behind using potentially outdated historic resource evaluations and whether any conclusions from past works, studies, etc. were verified and observed in the field, including looking behind the concealments.

8.3 (E-3)

Transportation and Circulation

The Transportation Study Area and Intersection Analysis Locations (Fig. IV.C.1) outlines the Study Area. This restricted area is wholly inadequate to evaluate traffic impacts associated with the proposed project. Third Street must be included as well as Folsom Street. These are major access streets into downtown and to the proposed development.

2.1 (E-4)

Also, because of the potential permanence of traffic restrictions on Market Street, there should be any analysis of how these changes to Market Street affect the streets to the south and east, including Mission Street, Howard Street, Folsom Street and the numbered streets from Third to Eighth Streets as related to the proposed project.

2.11 (E-5)

Parking. Almost every DEIR has the following language: "Parking—Parking supply is not considered to be a part of the permanent physical environment in San Francisco. Parking conditions are not static, as parking supply and demand varies day to night, day-to-day, month-to-month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

2.5 (E-6)

"Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines § 15131(a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, may induce many drivers to seek and find

alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's —Transit First policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that —parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation.

2.5 (E-6) (continued)

"The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. "

Doesn't this statement apply to the proposed project? If not, why not and is additional evaluation required?

Submitted by:
Hisashi Sugaya
(Planning Commission Hearing of December 10, 2009

LETTER F

The Yerba Buena Consortium

182 Howard Street, Suite 519, San Francisco, CA 94105

A Council of Yerba Buena Center's Housing, Health, and Social Service Providers

Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

December 16, 2009

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CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

RE: 935-965 MARKET STREET PROJECT CITYPLACE
DRAFT ENVIRONMENTAL IMPACT REPORT
CASE NO. 2005.1074E
STATE CLEARINGHOUSE NO. 2008102089

Once again we have a DEIR that contains extensive data but misses the big issues and big problems.

All the parking analysis is based on data for a typical weekday. They are interesting numbers/methodology. But of course maximum parking demand and impacts do not occur on a typical weekday. Instead maximum retail demand occurs on Saturdays, not weekdays. And then seasonally of course it peaks during the one month-plus Holiday shopping period. All peak load/impact analysis should address these conditions instead. This is not just an environmental impact question, it is also an economic impact question since Saturdays and the Holiday season account for a greatly disproportionate share of retail sales volume, and parking/traffic trouble then could seriously hurt the City's economy. **2.4 (F-1)**

It is empirically clear that existing parking facilities fill up often during the holiday season. Last Saturday the 12th I observed that the mid-afternoon queue for the Fifth/Mission Garage was backed up southward on Fifth all the way to Harrison Street, and on Howard all the way back to Fourth St. Next Saturday it will be even worse. But the artificially narrowed DEIR tally totally fails to capture this real world situation. And we are now in an economic recession, whereas during growth years the shopping traffic and parking demand was in the past and will be in the future greater beyond any doubt – just check the Fifth/Mission Garage records from earlier this decade. These 2008-09 stats are artificially depressed due to the current recession and need to be adjusted upward for "average" economic conditions.

Moreover, the cumulative parking supply analysis failed to add potential cumulative future retail growth. This despite the current discussion of converting a substantial portion of the Metreon mall (now depressed and largely vacant) to comparable discount retail use. **2.12 (F-2)**

The bottom line is there is a foreseeable significant retail parking shortage in coming years in the this district after economic recovery. The consequence of such a shortage will be increased on-street queues and degraded levels of service at the impacted intersections at the actual peak times of Saturdays and the Holiday season. The DEIR fails to report this very important fact and policy consideration.

Then we turn to pedestrian issues. But even though the Project and cumulative retail development traffic impacts fall mostly upon nearby SOMA streets and intersections, the pedestrian/traffic safety issues of those locations are totally ignored by the DEIR. **2.8 (F-3)**

Sixth Street with its very heavy existing traffic is widely known to be a very dangerous street for pedestrians, with many reported injury accidents. And it will be the necessary access route to the Project's garage, thus adding to this existing problem. The DEIR however ignores all this despite its importance to the hundreds of residents living almost next to the proposed Project in the Sixth Street Corridor!

2.8 (F-3) (continued)

What a proper EIR would do is identify this issue, report the impact, and discuss potential mitigations. Certainly signalized mid-block pedestrian crossings someplace on the Market-Mission and Mission-Howard blocks of Sixth Street where most injury accidents occur would be on that list. An overall Sixth Street Pedestrian Safety Plan – none now exists – would also be an essential initial mitigation.

2.10 (F-4)

Other garage developers in the district have funded new signals/crosswalks in comparable situations (Fourth/Minna per the Fifth/Mission Garage Expansion and Third/Stevenson per the Jessie Square Garage Project) to improve both traffic flow to/from their garages and traffic/pedestrian safety. Why was this standard mitigation not included in this DEIR?

Sincerely,

John Elberling
Chair

LETTER G

1277 9th Avenue Apt. 102
San Francisco, CA 94122

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DEC 09 2009
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT

December 7, 2009

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: 935-965 Market Street Project (City Place) Draft EIR

Dear Mr. Wycko,

Thank you for the opportunity to review and comment on the above referenced subject. It is pleasing to learn that someone is trying to improve on the urban blight known as Mid-Market and much needed, new parking is included in the proposal. After reviewing the Draft EIR, I have a few comments which are noted below.

Regarding: removal of 13 parking spaces on the south side of Stevenson Street. (pg IV.C.35) Has the proposed project studied the impact of the loss of the 13 metered parking spaces on Stevenson? Parking is already at a premium in San Francisco and much to the chagrin of activist-bike-coalitions; San Francisco residents still use their cars and need places to park them while shopping or while at work. Taking away existing parking would add to the problem unless it is as economical and convenient to park in a new parking structure.

2.5 (G-1)

Regarding: potential formation of vehicles queues on Stevenson Street that would overflow onto Sixth Street (pg IV.C.38). Has the proposed project considered making the ingress lane long enough for multiple cars to get off-street before encountering the parking ticket dispenser? (similar to The Grove's parking structure in LA) Traffic may flow quickly off-street and won't impede Stevenson/Sixth Street traffic by backing up onto Sixth Street when the cars are waiting to get the parking ticket dispensed so they may proceed and find a parking space. The 5th/Mission garage does not have a lot of leeway between the driveway and the parking ticket dispenser thus causes traffic to back up onto Mission Street and impedes the flow of traffic from 5th onto Mission. It would not be advised to repeat poor parking garage design. More than one ingress lane would also help with vehicle queues.

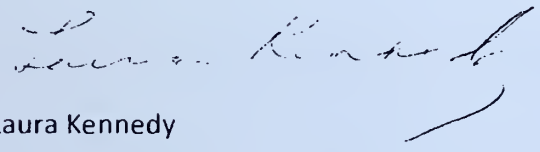
2.6 (G-2)

Regarding: Fig II.6 Proposed ground floor plan shows one driveway off of Stevenson Street with ingress and egress lanes (1 for each). Will the proposed project enforce a right-turn only for vehicles that are exiting from the parking structure onto the proposed Mitigation measure M-TR-1c? It will cause traffic congestion if vehicles exiting the garage are allowed to make left hand turns onto Stevenson Street while vehicles are attempting to enter the garage from Stevenson Street.

Regarding: pg V.2 section A. Growth Inducement. 'The Initial Study concluded that the increase in employment on the project site could potentially result in an increase in the demand for housing, assuming conservatively that at least some of the new retail employees on the project site would be new to San Francisco, this potential increase in housing demand as a result of the proposed project would not be considered substantial in the context of total housing demand in San Francisco'. There are a few problems with these "assumptions". Housing for middle-class workers in San Francisco already doesn't exist. Unless you are poverty stricken or extremely wealthy, the City of San Francisco will not build housing for you. A 3.1% increase is very substantial in the context of total housing demand in San Francisco. There already isn't enough housing. A mixed-use housing and retail project may be more appropriate for this project or the development of middle-class level housing at another site could mitigate the increase in demand for housing that will occur as a result of this project. I doubt the new retail employees will be moving into Rincon Hill as that is out of most people's price point who work retail. See also pg 35 of Appendix A Initial Study where it states: 'Although housing demand in and of itself is not a physical environmental effect, an imbalance between local employment and housing can lead to long commutes with associated traffic and air quality impacts'.

7.0
(G-3)

Sincerely,



Laura Kennedy

Fw Comments on the 935-965 Market Street Draft EIR

From: Debra Dwyer [Debra.Dwyer@sfgov.org]
Sent: Tuesday, January 05, 2010 5:38 PM
To: Barbara Sahm; Peter Mye; Abrams, Jim
Cc: Nannie Turrell; Bill Wycko
Subject: Fw: Comments on the 935-965 Market Street Draft EIR

Attached please find an additional comment on the DEIR for 935-965 Market Street.

Best regards,

Debra

Debra Dwyer
Environmental Planner
Major Environmental Analysis Section

ph 415.575.9031
fax 415.558.6409

San Francisco Planning Department
1650 Mission Street, Suite 400, San Francisco, CA 94103
www.sfgov.org/planning

----- Forwarded by Debra Dwyer/CTYPLN/SFGOV on 01/05/2010 05:36 PM -----

Bill Wycko/CTYPLN/SFGOV
01/05/2010 05:35 PM

To: Debra Dwyer/CTYPLN/SFGOV@SFGOV
cc:
Subject: Fw: Comments on the 935-965 Market Street Draft EIR

----- Forwarded by Bill Wycko/CTYPLN/SFGOV on 01/05/2010 05:35 PM -----

Tom Radulovich <tom@livablecity.org>
12/21/2009 05:00 PM

To: Bill Wycko <Bill.Wycko@sfgov.org>
cc: John Rahaim <john.rahaim@sfgov.org>
Subject: Comments on the 935-965 Market Street Draft EIR

Mr. Wycko,

On behalf of Livable City, I submit the following comments on the 935-965 Market Street Draft EIR:

The Transportation Analysis contained in this Draft EIR inadequately analyzes and mitigates the impacts of this project on pedestrian safety and circulation, bicycle safety and circulation, traffic impacts, and transit circulation. **4.1** (H-1)

1. The EIR modeled the number of trips generated, and the percentage of trips generated, for various alternatives, including both the developer's preferred alternative, with up to 280 parking spaces, as well as a no-garage alternative, with no parking spaces. Regardless of the amount of parking in the alternatives, the number of trips generated AND the number of auto trips generated by the project do not vary. This illustrates a fatal flaw in the Planning Department's Transportation Analysis guidelines ? they cannot account for the effect of parking availability, or parking price, on travel behavior. **2.3** (H-2)

San Francisco's General Plan policies, as well as the Planning Code controls on parking in C-3 districts, are built on the understanding that additional parking generates additional auto trips:

> "the amount and location of additional short term spaces allowed in the core should be carefully regulated. Short-term parking spaces attract more automobiles per day than long term spaces and do so during the midday periods when the number of traffic lanes is reduced by street parking and loading. Too much short-term parking would attract trips that otherwise would be made by transit and could add substantially to midday congestion.
> Additional short term spaces in the core should be created primarily by converting existing long-term spaces to short term spaces. This could be achieved by setting high rates on all day use and not providing weekly or monthly rates. In the case of new buildings short term spaces could be provided within the building to replace long and short term spaces displaced by the new development, if excessive congestion in the immediate vicinity will not result." (Downtown Area Plan, Policy 20.7)
>
> "A basic assumption of the Transportation Element is that a desirable living environment and a prosperous business environment cannot be maintained if traffic levels continue to increase in any significant way. A balance must be restored to the city's transportation system, and various methods must be used to control and reshape the impact of automobiles on the city. These include improving and promoting public transit, ridesharing, bicycling and walking as alternatives to the single-occupant automobile; limiting the city's parking capacity, especially long-term parking in commercial areas; directing major traffic movements to certain routes; and limiting the vehicular capacity of the city's streets and highways." (Transportation Element)
>
> "Land use controls that will lead to a sustainable mode split, and reduced congestion could include: Establishing parking caps for residential and commercial uses" (Transportation Element, Policy 14.8)

The understanding that the cost and availability of parking influence travel behavior, and that more and cheaper parking induce additional auto

trips, are the foundation of all contemporary parking management. This is based on the principle of supply and demand, which has been a fundamental principle of economic thought for at least two centuries. Yet the Planning Department's trip-generation models cannot adequately account for the differing travel behavior, and the differing transportation impacts, caused by traffic congestion.

Additional traffic congestion will slow public transit in the plan area, and will degrade bicycle safety and access, and must be accounted for accurately.

2.3 (H-2) (continued)

2. The Draft EIR does not accurately account for, or mitigate, the impact of traffic generated by the project on pedestrians.

In its pedestrian analysis, the EIR focuses exclusively on "Pedestrian Level-of-Service", a measure of sidewalk crowding. It analyzes Pedestrian Level-of Service only on Market Street, which has the widest sidewalks in San Francisco. This analysis is inadequate because it does not account for the potential injury to pedestrians by auto traffic generated by the project. Few, if any, pedestrians have been killed or injured by sidewalk congestion, but many are injured by collisions with autos. Many of the most dangerous intersections in the South of Market area are located on streets directly affected by this project, namely 6th Street, which will be a primary access corridor to the project. The corners of 6th and Market, 6th and Mission, 6th and Minna, and 6th and Jessie have high levels of pedestrian collisions. This project will generate significantly more traffic on 6th, as well as 5th and possibly Market Streets. The number of cars using narrow Stevenson Street will go from virtually none today to over 140 per hour, with significantly higher volumes at peak shopping times. These additional turn movements onto and off of Stevenson will cross bicycle lanes planned for 5th street as well as the busy (and narrow) sidewalks on 5th and 6th. Cars queueing to enter the garage, or waiting to exit onto the numbered streets, can result in blocked crosswalks and bicycle lanes.

2.8 (H-3)

In order to adequately address pedestrian safety, the project EIR must:

- * use a pedestrian safety model, like the city's Pedestrian Injury Model, which can accurately model the impacts of additional traffic and additional turn movements on pedestrian safety.
- * mitigate the impacts on pedestrians and cyclists by bringing sidewalks and crosswalks up to the City's adopted standards. The downtown Streetscape plan calls for:
  - ** sidewalk widths on 'base case' streets of 12-14 feet. The project should widen sidewalks on 5th and 6th Streets to the city standard.
  - ** bulbouts at street corners. The project should provide bulbouts into 5th and 6th streets at Market in accordance with city standards.
  - ** additional street crossings. The additional traffic caused by the project will further endanger pedestrians crossing at the small streets parallel to Market. Crosswalks with corner bulbouts should be built at 6th and Stevenson, 6th and Jessie, and 5th and Jessie (aka Mint Plaza)

Tom Radulovich
Executive Director
Livable City
995 Market Street, Suite 1550
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415 344-0489
tom@livablecity.org

LETTER I

SAN FRANCISCO BICYCLE COALITION

995 Market Street Suite 1550
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CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Comments on Draft Environmental Impact Report for 935-965 Market Street (CityPlace) project

On behalf of the 11,000 members of the San Francisco Bicycle Coalition (SFBC), I hereby submit our comments on the Draft Environmental Impact Report (DEIR) prepared for 935-965 Market Street (CityPlace) published November 4, 2009. Setting aside the project's excessive and massively policy-incoherent parking garage dimensions as described in the DEIR (and recognizing that the project would require a Conditional Use authorization for such excessive accessory parking), we note the following deficiencies in the DEIR:

1. The DEIR presents a flawed estimate of automobile trips associated with the project, predicting as many new auto trips for the No Garage Alternative as for the proposed project: **2.3 (I-1)**

> The project-related demand for parking and loading under the No Garage Alternative would be the same as that for the proposed project. *(DEIR. page VI.9)*

This assertion casts strong doubt on the trip generation and assignment methodology utilized in preparing this DEIR (assumptions developed by the San Francisco Planning Department and published in the *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002). Provision of any new auto parking in the project will contribute to an existing surplus of generally available auto parking in the vicinity of the project:

> [T]he three largest facilities – the Fifth/Mission Garage. the Ellis/O'Farrell Garage, and the Union Square Garage – all operate with a surplus of available spaces. Overall, there are over 5,800 offstreet parking spaces in the vicinity of the project site; about 1,500 of these were unoccupied at the time of the parking survey. *(DEIR. page IV.C.17)*

Such an increase in auto parking supply by the proposed project can be reasonably expected to attract new auto trips to the project area (indeed, a growing body of research and evidence substantiates just such an auto trip generation effect), but the DEIR makes no distinction in "parking demand" between the addition of hundreds of new auto parking spaces and the omission of any new auto parking. The DEIR must present a more responsible account of the true need for, and likely effects of, auto parking in the project.

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SAN FRANCISCO BICYCLE COALITION

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www.sfbike.org

2. We dispute the DEIR's assertion that the proposed project will create 'less-than-significant impacts' on bicycle travel. Given the DEIR's estimate of 280 new auto trips at PM peak entering and exiting Stevenson Street, we believe that such additional vehicle movements would present considerable, and potentially significant, new conflicts and safety impacts to pedestrian and bicycle circulation in the project area, particularly on Fifth Street (Bike Network Route #17) and Market Street (Bike Network Route #50), both designated bicycle routes. Market Street already carries very large volumes of bicycle traffic and both streets are expected to see increases in bicycle traffic as improvements derived from the 2009 San Francisco Bicycle Plan and other plans and projects are implemented. The project sponsor is able to claim 'less-than-significant impacts' because the city has failed to provide a threshold for determining significance of impacts on bicycle travel. The modeling and analysis fails to recognize the public safety and public health effects related to vehicle and bicycle circulation and must be revised and refined for this DEIR prior to certification.

2.7 (I-2)

TRANSPORTATION

3. Pedestrian effects are only evaluated in the DEIR on the basis of sidewalk crowding, not public safety or public health. The DEIR fails to address impacts of 280 new auto trips at PM peak, which will be crossing the pedestrian realm at both the intersections of Stevenson on 5th and 6th Street. As for comment #2 above, and given the city's many declared and adopted policy commitments for increased pedestrian activity on the streets and sidewalks in the project area, we believe that the DEIR should develop more rigorous modeling and analysis of public safety and public health effects related to vehicle and pedestrian circulation.

2.8 (I-3)

On these points the SF Bicycle Coalition respectfully finds the Draft EIR of the 935-965 Market Street (CityPlace) project to be inadequate and deficient, and we ask that the DEIR account for these points in a fair estimation of the true impacts of the project.

4.1 (I-4)

Sincerely,

Andy Thornley
Program Director
San Francisco Bicycle Coalition

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LETTER J

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CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Environmental Review Officer
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103

To Whom It May Concern:

I have reviewed the Draft EIR for 935-965 Market Street.

According to the transportation section of the report, the project would add about 200 vehicle trips into the Project garage, and about 200 trips out, during the peak hour of the evening, for a total of about 400 vehicles. These would all be added on Stevenson Street, a small alley.

Meanwhile, the Project aims to remake Stevenson Street into a pedestrian-friendly "green street". Pedestrians would be drawn to new "microvendors" on Stevenson Street, among other attractions. Bicycles would likely frequent the microvendors as well.

Despite putting about 400 cars per hour on this pedestrian-oriented street, the EIR found that there would be no significant impact to pedestrians. Likewise, when these 400 cars have to cross the crosswalks of 5th and 6th Streets, which have many pedestrians, there was again no finding of significant impact to pedestrian.

How do we know that this volume of cars crossing will not cause a significant impact to pedestrians? Given the especially vulnerable pedestrians who live in this area, it appears that vehicle/pedestrian collisions would increase.

The Final EIR should include the finding of significant pedestrian impacts resulting from high numbers of vehicles on Stevenson Street and crossing the crosswalks along 5th and 6th Street.

2.8
(J.1)

Sincerely,

John Fordham
PO Box 1435
San Francisco, CA 94110

Appendix B

Transcript of Public Hearing

SAN FRANCISCO PLANNING COMMISSION

DRAFT EIR PUBLIC HEARING FOR

935-965 MARKET STREET

AGENDA ITEM 13

CASE NO. 2005.1074E

DECEMBER 10, 2009

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REPORTED BY: Joanna Broadwell

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510.486.0700

THE CLERK: Commissioners, you are now on Item No. 13, Case No. 2005.1074E for 935 through 965 Market Street. This is a public hearing on the Draft Environmental Impact Report.

MS. DWYER: Good afternoon. I am Deborah Dwyer, Planning Department staff in the MEA Division. This is a hearing to receive comments on the Draft Environmental Impact Report for Case No. 2005.1074E, the 935 to 965 Market Street project between Fifth and Sixth Streets. Staff is not here today to answer comments. The comments will be transcribed and responded to in writing in the "Comments and Responses" document which will respond to all verbal and written comments received and make reference to the draft EIR as appropriate.

This is not a hearing to consider approval or disapproval of the project. That hearing will follow the final EIR certification. To briefly summarize, the DEIR addresses project effects with respect to transportation and circulation, transportation-related noise, air quality and operational air quality with respect to toxic air contaminants and greenhouse gases. And land use and esthetics were discussed for informational purposes. All other environmental topics were analyzed through the initial study process.

The analysis found that there would be significant

and unavoidable impacts with respect to transportation at the intersections of Fifth and Stevenson Streets and Fifth and Mission Streets. In addition, under the draft Bay Area Air Quality CEQA guidelines proposed at the time of publication, there would be a significant and unavoidable emissions-related greenhouse gas emissions impact which is based on the proposed threshold. The comments today should be directed to the adequacy and accuracy of information contained in the draft EIR.

Commenters should speak slowly and clearly so that the court reporter can produce an accurate transcript, and also the commenters should state their name and address so that they can be properly identified and so they can be sent a copy of the "Comments and Responses" document when it's completed. After hearing comments from the general public we'll also take any comments on the draft EIR by the Planning Commission.

The public comment period for this project began on November 5th, 2009 and extends until 5:00 p.m. on Monday, December 21st. This concludes the presentation on this matter. And unless the Commission members have any questions, I would respectfully request that the public hearing be opened.

COMMISSIONER MIGUEL: Thank you. I only have one comment, public comment card. Brian Shehee.

MR. SHEHEE: Good afternoon, President Miguel and Commissioners. My name is Brian Shehee, and I am a small business owner on Sixth Street, right across from Stevenson. That's right around the corner from the proposed City Place development. I support any type of business investment in this long-neglected neighborhood. Our business has been in operation there since 2002. I have many good things to say about City Place, although I know today's comments are restricted to the DEIR. I want to say that I believe the DEIR is sufficient and complete. And I want to thank you for your attention to it. I look forward to coming back and speaking in more details at a later date. Thank you.

5.1 (TR/K-1)

4.1 (TR/K-2)

COMMISSIONER MIGUEL: Thank you. Additional public comment?

MR. SHAW: Thank you. Randy Shaw again, director, Tenderloin Housing Clinic. I don't think I have been to the Planning Commission in a few years, and not twice in one afternoon. So that is how it is. I just echo the thoughts of the last speaker, and I know we're not here on the merits. And I think the DEIR is sufficient and should move forward. I do want to add that the location of this project is really vital to the revitalization of the lower part of Turk and the Tenderloin. If you look at the division it is almost like 200 yards. This is really --

4.1 (TR/L-1)

5.1 (TR/L-2)

the fact that this site has laid fallow for so long has really hurt the Tenderloin community. So hopefully this can move forward. It's going to be a dynamic project, and the sooner the work gets created it will make it a safer area for the lower Turk and improve businesses in the Tenderloin, and when we get to the merits it gets my full support. Thank you.

5.1 (TR/L-2) (continued)

MS. DIAMOND: Good afternoon. I'm Carolyn Diamond, executive director of Market Street Association. And I am here to support the project as a critical piece to the rehabilitation and improvement of the Market Street neighborhood. Although the traffic would increase in the area, there seems to be feasible mitigations to deal with this. Pedestrian increases, which is cited in the EIR, will add 1,234 pedestrian trips around the project site. This increase of pedestrian travel, which the 30-foot Market Street sidewalks can accomodate, will add to the vitality of this block, create critical mass, and help establish a safer, more comfortable emotional sense for those in the area.

5.1 (TR/M-1)

2.10 (TR/M-2)

5.1 (TR/M-3)

With the neighborhood development of residential units including projected 1,700 new units at Market and Eight Street, this type of retail project will be invaluable to the Market Street new residents. This retail will allow the new residents to shop nearby and not have to

5.3 (TR/M-4)

travel to other shopping destinations.

The concerns about this project are legitimate, but I am sure that they can be mitigated. For me, the bigger concern is if this retail project cannot be built, what can? What will invigorate and rehabilitate this neglected stretch of mid-Market Street? Thank you.

5.3 (TR/M-4) (continued)

COMMISSIONER MIGUEL: Thank you.

MR. FLORES: Good evening. Manny Flores, Carpenters Local 22. We support the draft EIR. We are looking for your approval come spring. Market Street, boy, I'll tell you, it needs it. And we are looking forward to it, and we look forward to your approval come 2010. Thank you very much.

4.1 (TR/N-1)

4.2 (TR/N-2)

COMMISSIONER MIGUEL: Thank you. Is there additional public comment on this item?

If not, public comment is closed.

I think the concept of improving this section of Market Street is obviously long awaited. And I appreciate the fact that the proposed tenants will put a new mix of retail in the immediate downtown area and will provide for what we have already been providing, a shopping area for the residential that we have been putting into the general area and will continue to do so.

5.1 (TR/O-1)

My only comment has to do with one item on Table 4C3, which has to do with the off-street parking and

2.5 (TR/O-2)

occupancy that is currently in the area. And in particularly something such as the Fifth and Mission garage, which is something like 63 percent occupancy. That garage, even during better economic times and during the middle of holiday rush, has never been sold out. It is what, two blocks from the project.

2.5 (TR/O-2) (continued)

So although I am not commenting heavily on the rest of the project and on the EIR specifically, it is just that if you are going to have this tremendous increase of pedestrian traffic, that is exactly what we want and not necessarily a building that provides a great deal of parking that may not be necessary. And I will go into that further when the project comes up.

Commissioner Sugaya?

COMMISSIONER SUGAYA: Yeah. I have a couple pages' worth of comments here but in the interest of time I will just turn them in. They deal with historic resources. I will just go through them quickly. The evaluation says that the building has no integrity and cites six aspects of integrity. There are actually seven, so I think the seventh one needs to be addressed. Also there is no evaluation of the seven aspects of integrity. It just says they aren't met. And I don't know why. There are also arguments in there that the facade is covered over and therefore is invisible, and the use of terms like

8.4 (TR/P-1)

"concealment of large portions of the facade," I think someone needs to go take a look at the buildings again because concealment really can't be used as a factor to dismiss the evaluation of integrity.

8.4 (TR/P-1) (continued)

I would like to know in the response to comments what the preservation tax specialist in the Department's comments were on the DEIR. Also I don't believe this has gone to the Historic Preservation Commission. If not, I'd like to know why it wasn't sent for their comments since it does involve historic resources.

8.1 (TR/P-2)

The DEIR continually references the mid-Market redevelopment plan, final EIR for much of its analysis of historic resources. In fact, the historic resource survey that was -- that was done for the mid-Market plan was done over 10 years ago. And I think some reassessment is in order.

8.3 (TR/P-3)

Transportation and circulation, I think the area that was studied for the transportation study is too small and should be expanded to include at least out to Folsom Street and Third to Eighth.

2.1 (TR/P-3)

Also that because of the more recent trial, I guess you'd call it, which seems to be heading toward being more permanent, I would like to know if that is a legitimate concern with respect to the traffic and circulation study itself, referring to the changes where you're coming down Market Street and now have to divert off of whatever they are, Tenth and whatever, and

2.11 (TR/P-4)

what that -- what the impact of that is on this particular project.

Also on parking, there is an extensive study, I believe, in the EIR. But the language in almost every DEIR that we have ever seen referring to parking supply is not considered to be part of a permanent physical environment in San Francisco and that parking effects are considered to be social rather than impacts on the physical environment as defined by CEQA, I would like to know why that language isn't contained in the parking section and why it isn't a legitimate reason for rejecting parking in this case. I have this more detailed, and I will give it to the court reporter at the end of the hearing.

COMMISSIONER MIGUEL: Commissioner Antonini?

COMMISSIONER ANTONINI: I read over the DEIR in great detail. I thought it was extremely well done. And while we are not talking about the specific merits of the different proposals, it has been raised, so we should say that, in fact, the study does project demand of about 480 parking spaces per day. And, you know, if it is -- the project as proposed, of course, and the supply of 201 off-street parking places leaves a shortage of 279. And they go into talking about off-street parking.

The on-street parking, of course, is very problematic. And I doubt you would be able to find very

2.11 (TR/P-4) Page 9(continued)

2.5 (TR/P-5)

4.1 (TR/Q-1)

2.5 (TR/Q-2)

many places. But they did say that they analyzed 18 off-street parking facilities, and they found that there were 5,800 off-street parking places in the vicinity that would be close enough to conceivably walk. One of them is Union Square. It is a pretty good hike. And 1,500 of these were unoccupied at the time of the parking survey. So it seems as though the demand could be met by the parking, but only if you supply the full required parking as proposed in the program. If you build the project without the parking, you are not going to meet the demand with the existing parking.

2.5 (TR/Q-2) (continued)

And there are also a lot of problems with durable goods. Having to transport them any considerable distance is going to be very difficult to do. If you are carrying a television set, it probably is not easy to move it three or four blocks to your car. So, anyway, that is not before us today. But I did think the analysis was very well done. And we'll have more discussion when the actual project comes in. But I think -- I received this in a very timely manner. The comment period is more than long enough and I am really happy with it.

4.1 (TR/Q-3)

2.5 (TR/R-1)

COMMISSIONER MIGUEL: Commissioner Lee?

COMMISSIONER LEE: I just want to add a couple things. San Francisco's economy is really based mostly on tourism. And we have a drop in tourism. You notice the

Convention Visitor Bureau pushed about town, which drives me to thinking where my issue is, which is about parking and walkability. And if you are from out of town, we get 18 million visitors. Not all of them come from out of state. Or they come from different parts of the Bay Area. You will need the parking there.

2.5 (TR/R-1) (continued)

And regarding the Fifth Street garage, I would be surprised if it hasn't been sold out. I am pretty confident it's been sold out before. But if you look at the future growth of San Francisco and take us straight down to Market and Van Ness, and including Mission, the elimination of a lot of parking for some of the housing we have now, and if you really want to have outsiders come in here, besides tourists and people that spend the money -- and remember, our number-one job in development area is actually the tourist industry through the hotels, through the restaurants. And, frankly, I don't think that the EIR -- I agree with the EIR analysis. We are going to be short of the parking. When we have the opera, symphony and ballet, even people outside come in here, you can't get enough parking in that area which drives us down to the mid-Market area. And so I think the document is complete regarding the parking. And I think that -- I know it's going to be an issue, but if you want people from the Bay Area to come with business and spend their money, we are

going to need the parking spaces.

And regarding whether or not Target comes here or not, if you carry bags, boxes, you have got to be able to drive them somewhere. If you are from out of town, you buy things, you want to be close to the parking.

2.5 (TR/R-1) (continued)

COMMISSIONER MIGUEL: Commissioner Antonini?

COMMISSIONER ANTONINI: Commissioner Lee made a good point. But prospective shoppers in this complex are not just people from outside San Francisco and tourists but San Franciscans themselves who typically will drive out of the City or -- to get -- to make durable good purchases, and tax revenue goes to other places. This is sort of the Home Depot argument and others that have come up before. But if you don't make it convenient for them, they'll go where it is convenient. And if we hope for this to work, we've got to make it so people can come and they can purchase. Otherwise it becomes a mail-order type situation where, you know, you just go in and pick something out and it gets sent to you. But you don't have the jobs and you don't have the merchandise onsite if people can't take that merchandise with them when they leave.

5.1 (TR/Q-4)

COMMISSIONER MIGUEL: Commissioner Moore?

COMMISSIONER MOORE: This project seems to be relying on reinterpreting Stevenson Street with a traffic light. And I think the Transportation Authority needs to

2.10 (TR/S-1)

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weigh in as to whether or not in that close a distance you even physically can install a light. I would like to remind us about the reinterpretation of Stevenson when we talked about the plaza a couple of years ago. That was to be an active alley with historic smaller buildings on either side including active users who found an entrance door off Stevenson. This particular EIR, by re-interpreting it, does not fully really acknowledge that there was, indeed, an agreement to change. The only thing which we allowed at that time was valet parking for Westfield. We moved the door of Westfield up so it would be easier to accomodate that, and that required a left turn. We are now getting into a gray area where the two of what we heard then and are now hearing is not fully coordinated, which brings me to one point probably already mentioned in Commissioner Sugaya's comment. I found a noticeable absence of discussing the impact on the large number of historic buildings near and far because the entire block in which this project is proposed is primarily buildings. Across the street and further down going east we have the largest number of historic buildings marking the original meaning of Market Street.

And while I am not opposed to find ways to insert something new and alleviate what hasn't happened for many years, I think the EIR needs to go more thoughtfully,

2.10 (TR/S-1) (continued)

2.10 (TR/S-2)

8.6 (TR/S-3)

8.6
(TR/S-3)
continued

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analyzing what that means relative to a new building. And I do think that parking, to comment on Mr. Rodolovich's point in a newspaper article here which you probably all read, that parking is the antithesis of what we are trying to do with Market Street.

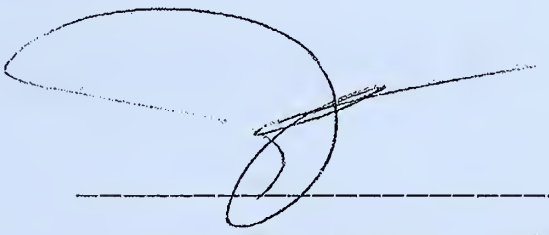
2.5
(TR/S-4)

COMMISSIONER MIGUEL: No additional comments? That will close the hearing.

THE CLERK: Do you want to just remind the public that written comments will be accepted at the Planning Department offices until 5:00 o'clock p.m. on December 21, 2009? Thank you. With that, public hearing is closed.

CERTIFICATION OF REPORTER

I, JOANNA BROADWELL, state that the above proceedings was transcribed by means of computer-aided transcription, and that the foregoing is a full, complete and true record of said testimony.



JOANNA BROADWELL, CSR 10959

Appendix C

Exhibit to

Public Hearing Comment TR/S-4

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SFGate.com

Parking may be a problem for CityPlace mall

John Coté, Chronicle Staff Writer
Monday, December 7, 2009

Transforming the two, long-blighted blocks of San Francisco's Market Street that run from U.N. Plaza to the Powell Street cable car turnaround could come down to a fight over parking.

Developer David Rhoades has a plan for a modern, glassy retail center with stores like Toys R Us, outlets like Off 5th and perhaps a Target to replace three vacant buildings along the south side of Market between Fifth and Sixth streets.

Rhoades and others see his CityPlace project as a catalyst that would improve the mid-Market area, now largely the province of smoke shops, street characters and shuttered storefronts.

"I think it will be absolutely transformative," said David Addington, who owns the nearby Warfield Theater building and authored the failed November ballot initiative that would have allowed digital billboards to help fund a theater and arts district. "Market Street, as you move west from Fifth Street, is basically shrouded in a veil of blight. This will pierce that."

The Planning Commission is holding a hearing Thursday on the project's environmental report, kicking off a potentially contentious approvals process. Some are already questioning whether traditionally suburban retailers belong along the city's transit backbone.

Retail details

The project calls for 264,000 square feet of retail space in six stories, one of those below ground, and a 201-space underground parking garage with access on a newly landscaped Stevenson Street.

The 90-foot building would be built to green building standards. No one has signed on the dotted line, but it is to house five to 10 stores - chains like Sears, Fry's Electronics and Sports Basement, or outlet stores like Nordstrom Rack, the developers said.

To get the funding, lenders want commitments from prospective tenants, and those retailers demand some parking, the developer said.

"We can't build this unless we have the parking," Rhoades said.

The civic group Livable City has architectural concerns about a modern, five-story glass curtain on

a street with historic columned buildings and street-level storefronts. But its main opposition is to the parking garage, which the group says would undo current efforts that have cut cars on Market to make Muni more efficient and bicycling safer.

"That isn't the location if you want car-oriented retail," said BART board member and Livable City Executive Director Tom Radulovich. "The transit and cycling impacts are going to be huge."

The environmental report suggests installing a traffic light at Fifth and Stevenson, preventing left-hand turns at some intersections and requiring large trucks to use the loading dock at night, but the Municipal Transportation Agency says some of those are infeasible.

Blight fight

From his office at Sixth and Market, Tim Colen, director of the San Francisco Housing Action Coalition, said he is concerned about increased traffic, but he's also frustrated that people have been talking about improving mid-Market for decades.

As far back as 1962, the predecessor to the San Francisco Planning and Urban Research Association think tank put out a report titled "What to do About Market Street." Starting in the mid-1990s, the city spent more than 10 years on a redevelopment plan that was ultimately shelved amid squabbles over affordable housing and parking.

"Politics gets in the way of things that are plainly needed," Colen said.

Rhoades said his project doesn't call for public subsidies, and Urban Realty has quietly spent more than $100 million since 2004 buying up enough property on the block to remake it on a large scale.

Besides the 1-acre CityPlace site, Rhoades' company owns 901 Market St., 925 Market St. and a 25,000-square-foot parcel that runs around the Warfield Building across the street.

"It takes a critical mass to make it work," Rhoades said.

Still, there will be opposition.

"This is San Francisco. You say mother and apple pie, and people call you a sexist sugar eater," Addington said. "There is nothing that people won't oppose."

Gabriel Metcalf, executive director of the SPUR think tank, said it's possible to balance traffic congestion and economic revitalization.

"Market Street has to be protected as the primary transit and bike street of the whole city. It's really important to get that right," Metcalf said. "It's also a big deal for the city to figure out how to revitalize that stretch of Market, so this is a problem worth solving."

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